

Privacy & Cookies Policy

Camden Acquisition Hub Ltd · Company No. 15431935 · ICO Reg. ZC148168

5-7 Buck Street, London NW1 8NJ

Last updated: 26 July 2026 — supersedes all previous versions, including the 9 June 2026 edition and any earlier version referencing Patient Acquisition Hub Ltd.

1. Introduction

This Privacy & Cookies Policy explains how **Camden Acquisition Hub Ltd** (“we”, “us”, “our”) collects, uses, stores, and protects personal data in connection with the services we provide through two service brands:

- **Camden Acquisition Hub** (camdenacquisitionhub.com) — a dental marketing agency serving independent dental practices in NW London (NW1, NW3, NW5, NW6): Google review automation, missed call recovery, reputation management, and hyper-local SEO.
- **Try Review Bloom** (tryreviewbloom.com) — a Google review automation and Google Business Profile (GBP) management service available to local businesses across London and the wider commuter belt.

Both brands operate under Camden Acquisition Hub Ltd, a company registered in England and Wales (Company No. 15431935), registered with the Information Commissioner's Office under registration number ZC148168. **Try Review Bloom was previously operated under the company name Patient Acquisition Hub Ltd; this is the same legal entity, since renamed.**

This policy is the single, current version for both brands and supersedes any other privacy policy page previously published on either website. Both websites link to this document.

2. Roles & Responsibilities (UK GDPR)

Data Controller

Camden Acquisition Hub Ltd is the Data Controller for data collected directly through our websites, marketing activity, and platform accounts (business client sign-up, login, billing).

Data Processor

Where we process data on behalf of a client — for example, processing a patient or customer's contact details to send review request SMS or email messages — we act as a Data Processor under instruction from that client. The client remains the Data Controller for their own customers' or patients' data and is responsible for having a lawful basis to share it with us.

3. What Data We Process

3.1 Review Automation Data (both brands)

To deliver automated review request campaigns, we process:

- Customer/patient first name and mobile number, provided by the client
- Job or appointment completion timestamps used to trigger the review request sequence

- Message delivery status (scheduled, sent, failed)
- Whether the customer has indicated they left a review, or opted out
- The client's own Google review link, used to direct customers to leave a review

We do not store clinical notes, treatment details, or diagnoses for dental practice clients.

3.2 Google Business Profile (GBP) Data

For clients using GBP management or connecting their Google Business Profile, we may process:

- GBP listing details (business name, address, hours, categories, photos)
- Review content and star ratings (publicly visible data from Google)
- GBP performance metrics (views, searches, call clicks, direction requests)
- Where a client connects their Google Business Profile account, an access token that allows us to read the profile data listed above on their behalf, for as long as the connection remains active
- Competitor GBP data used for comparative audits (publicly available data only)

A client may disconnect their Google Business Profile at any time from their dashboard, which immediately revokes our access and deletes the stored connection token.

3.3 Client & Billing Data

- Business name, registered address, and company/VAT number where applicable
- Authorised contact name, email address, and phone number
- Billing information, processed via Stripe (we do not store card details)
- Login credentials (passwords stored as salted hashes, never in plain text)
- Service usage history and correspondence records

3.4 Website & Technical Data

- IP address (short-term, for security and abuse prevention)
- Browser type, device type, and referral source
- Pages visited and session duration (aggregated analytics)
- Booking data when a free strategy call is booked via our scheduling tool

3.5 Prospecting & Outreach Data

In the course of business development, we may hold publicly sourced contact data (business name, address, phone, email) for prospective clients, sourced from Google Maps, public directories, or publicly listed websites. We process this under legitimate interests for B2B outreach and delete it promptly on request.

4. Special Category Data

Our platform does not intentionally process clinical health records or special category data as defined under UK GDPR Article 9. Because dental practice clients use our systems in a healthcare-adjacent context, we apply

enhanced security controls as a precaution, including encrypted connections, access controls, and defined data retention schedules.

5. Lawful Basis for Processing

Processing Activity	Lawful Basis
Delivering contracted services to clients	Performance of a Contract (Art. 6(1)(b))
Review automation and GBP management on behalf of clients	Performance of a Contract
Sending review requests to customers/patients	Legitimate Interests of the client (B2B); client's own consent mechanism (B2C)
Website analytics	Legitimate Interests (aggregated, non-identifiable)
Billing & account management	Performance of a Contract; Legal Obligation
B2B prospecting outreach	Legitimate Interests (Art. 6(1)(f)) — proportionate B2B direct marketing under PECR
Audit logs & legal compliance	Legal Obligation (Art. 6(1)(c))

6. SMS & Email Review Requests

Our core service involves sending SMS and email messages to a client's customers requesting a Google review. The following safeguards apply:

- Every message includes an opt-out mechanism
- A cooldown period (configurable per client, minimum industry-standard practice) prevents the same customer from being messaged again too soon
- Customers who confirm they have already left a review are automatically suppressed from further messages
- Requests are sent gradually, never as a mass blast, to maintain authenticity

SMS messaging complies with the Privacy and Electronic Communications Regulations (PECR) and ICO guidance on direct marketing. We only operate within the United Kingdom at this time.

7. How We Use the Data

We use data strictly to:

- Deliver Google review automation, GBP management, missed call recovery, and reputation monitoring services
- Send post-appointment or post-job review request SMS and email sequences on behalf of clients
- Generate campaign performance dashboards and reports for clients
- Process billing and manage client accounts

- Maintain platform security and prevent unauthorised access
- Conduct B2B outreach to prospective clients (business contact data only)

We do not:

- Sell personal data to any third party
- Share data with advertisers or data brokers
- Use data for automated profiling or AI-driven decisions that significantly affect individuals
- Process clinical notes, treatment records, or patient diagnoses

8. Technology We Use (Sub-Processors)

We use the following third-party providers to deliver our services. Each is subject to a Data Processing Agreement or equivalent contractual safeguard, and we use Standard Contractual Clauses (SCCs) approved under UK GDPR where data is processed outside the UK.

Provider	Purpose	Location
Supabase	Database, authentication, and secure storage of client and customer data	EU (Ireland)
Make.com	Workflow automation connecting client systems, scheduling, and message dispatch	EU
Twilio	SMS message delivery and phone number provisioning	USA (SCCs in place)
Vercel	Hosting for the client dashboard and login portal	USA/Global (SCCs in place)
Stripe	Payment processing (we do not store card details)	USA/EU (SCCs in place)
Cal.com	Booking data for free strategy calls	EU/USA (SCCs in place)
Google Business Profile API	Where a client connects their profile, reading listing and review data on their behalf	USA (Google's standard safeguards apply)

We do not use GoHighLevel, Mailgun, or Zapier as part of our own service delivery. A client's own third-party integrations they choose to connect to their job-management software are outside the scope of this policy and are governed by that provider's own terms.

9. Data Retention

Data Type	Retention Period
Review request delivery data	Duration of client contract + 30 days
GBP audit, performance, and connection data	Duration of client contract + 6 months, or until disconnected
Client account & billing data	Duration of contract + 7 years (legal requirement)
Website analytics (aggregated)	Rolling 26-month window, anonymised
B2B prospecting contact data	Until opt-out request, or 12 months from last contact
Aggregated performance metrics	Indefinite — cannot be traced to individuals

10. Data Sharing

We do not share personal data with third parties except the sub-processors listed in Section 8, necessary to operate our services. We will disclose data to law enforcement or regulators only where required by applicable

law, and will inform affected clients of any legally permissible compelled disclosure.

11. Security Measures

- Encrypted connections (HTTPS/TLS) across all web properties and APIs
- Role-based access control — client data is scoped and isolated per account
- Multi-tenant architecture with no cross-client data access
- Stripe tokenisation — no raw payment card data stored by us
- Audit logging of sensitive data access events
- Defined deletion schedules for data no longer required

In the event of a personal data breach that poses a risk to individuals' rights, we will notify the ICO within 72 hours and affected clients as soon as reasonably practicable.

12. Your Rights Under UK GDPR

Right	Description
Right to be Informed	To know how your data is collected and used — this policy fulfils that obligation
Right of Access	To request a copy of the personal data we hold about you
Right to Rectification	To request correction of inaccurate or incomplete data
Right to Erasure	To request deletion of your data, subject to legal retention obligations
Right to Restrict Processing	To ask us to limit how we use your data in certain circumstances
Right to Object	To object to processing based on legitimate interests, including direct marketing
Right to Data Portability	To receive your data in a structured, machine-readable format
Rights re. Automated Decisions	We do not make solely automated decisions that significantly affect you

To exercise any of these rights, contact us using the details in Section 15. Where we process data as a Data Processor on behalf of a dental or business client, we will redirect your request to the relevant Data Controller (the client).

13. Cookies Policy

Category	Purpose	Can Be Disabled?
Essential	Authentication, session management, security — required for the platform to function	No

Category	Purpose	Can Be Disabled?
Analytics	Aggregated, anonymised usage data (page views, session duration, traffic source)	Yes
Third-Party	Our scheduling tool (booking) and analytics providers operating under GDPR-compliant agreements	Yes

You can control and delete cookies through your browser settings. Disabling essential cookies may affect the functionality of our dashboards and portals.

14. International Data Transfers

Our primary database is hosted in the EU (Ireland). Where personal data is processed outside the UK or EEA — for example, via Twilio, Vercel, or Stripe — we ensure appropriate safeguards are in place, including UK-approved Standard Contractual Clauses (SCCs) or adequacy decisions.

15. Children's Data

Our services are directed at businesses and their adult customers. We do not knowingly collect personal data from individuals under the age of 18 through our websites or marketing activities. If a client's customer base includes under-18s, it is that client's responsibility, as Data Controller, to ensure appropriate consents are in place before sharing any such data with us.

16. Contact & Complaints

Company	Camden Acquisition Hub Ltd
Company No.	15431935
ICO Registration	ZC148168
Registered Address	5-7 Buck Street, London NW1 8NJ
Email	julien@camdenacquisitionhub.com
Website (Camden Acquisition Hub)	camdenacquisitionhub.com
Website (Try Review Bloom)	tryreviewbloom.com

You also have the right to lodge a complaint directly with the Information Commissioner's Office (ICO): ico.org.uk, helpline 0303 123 1113. We would always prefer the opportunity to address your concern directly before you contact the ICO.

17. Changes to This Policy

We review and update this policy periodically to reflect changes in our services, applicable law, or regulatory guidance. Material changes will be communicated to active clients by email with at least 14 days' notice before

taking effect. The current version of this policy is always available at camdenacquisitionhub.com and tryreviewbloom.com, and both websites link to this single document.

This policy supersedes all previous versions, including the version dated 9 June 2026 and the separate Try Review Bloom privacy policy page previously dated May 2026, which referenced the former company name Patient Acquisition Hub Ltd and an outdated list of technology providers.

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