

AlmaReach Privacy Policy

1. About this Privacy Policy

This Policy describes the way that AlmaReach Ltd (“we”, “us”) gathers, treats, discloses and records both the personal data which is provided to us by our clients (“you”), and that which is obtained through research with publicly accessible sources.

We share this Privacy Policy with clients and anyone else who requests a copy. We reserve the right to make changes to this Policy, and if we do so we will inform and share the amended Policy with clients and other relevant business parties.

This Policy was last amended on 20th February 2026.

2. Who we are and what we do

AlmaReach Ltd (henceforth “AlmaReach”) is a private Limited Company, registered by the UK’s Companies House (Company Number 17042475), with business offices at 82A James Carter Road, Mildenhall, IP28 7DE. The Directors of AlmaReach are Guy Semple and Toby Collins.

We provide a range of services relating to the enrichment of data stored by colleges, universities and other educational institutions (our clients) for the purposes of alumni engagement and fundraising. This includes bulk profile generation using public data sources, wealth/income rating based on this data, due diligence, mentoring programme allocations, and general research on the composition of alumni bases.

2.1. Methods

AlmaReach (the Data Processor) undertakes research and processes information on individuals, charitable trusts, and companies on behalf of its clients (the Data Controllers). This research is intended to be used for fundraising purposes and to inform strategy for alumni engagement, to help clients understand and build meaningful relationships with alumni by providing background information, and to provide an up-to-date top-level overview of alumni bases.

In order to provide useful insight on individuals at scale (often for thousands of alumni at once) we use artificial intelligence (“AI”) alongside other automation tools (which are managed with close human oversight and verification). Privacy-relevant details for these are covered below.

2.2. Data we collect from publicly available sources

We research a range of attributes for each individual requested by the Client. This includes current employment, locations and honours, career history, other business and professional interests and known philanthropic and charitable interests. These are all useful for informing clients of ability to give, and of likely areas of interest for which the College can tailor its approach when fundraising.

We also search for notable news, controversies, and lawsuits. This allows us to perform a surface-level due diligence check for all alumni as we generate profiles. This allows clients to better understand any potential risks associated with building a relationship with a prospective donor, and to flag ethical and reputational risks which may cause a donation or other association to conflict with the stated charitable aims and mission of the Client.

We only search publicly available sources. These derive from general internet searches (from multiple search engines), webpage retrieval (for e.g. company pages, news articles) or searches of public registries (including Companies House, the Charity Commission and various licensing institutions, such as the Solicitors Registration Authority). All of these data sources can be accessed by a manual researcher - no paywalls or credentials-limits are automatically bypassed.

2.3. Capacity and progression ratings

For each individual we provide: estimated income bands, wealth and gift capacity ratings, and likely medium-term career trajectory. This is to help clients calibrate alumni relations and fundraising strategies going forwards, as well as to inform about immediate prospects that should be focused on. These assessments use propriety, bespoke models trained on a range of public data (not trained on any of our clients' data). Ratings are calculated by applying these models to that information which has been provided by the Client, and that which we have retrieved from public sources. Information passed into these models includes current and former employment, along with sources, age, location, company accounts and other news.

2.4. Use of AI

For details on when and why Artificial Intelligence is used, consult the *AlmaReach AI Policy*.

2.4.1 Data sources for the AI

The tools available to the system (for the LLM to choose from) have been deliberately and carefully chosen by us. They include web search capability, webpage retrieval, and use of APIs for accessing public registries (such as Companies House). The LLM does not have independent web access enabled. Any tool call is trackable and recorded and we can view any data outputted at the point of retrieval (although raw sources are not subsequently stored).

The AI is also instructed to only extract information that directly relates to one of our fields of inquiry as listed above (e.g. employment information), and to discard that

which is irrelevant, superfluous, or refers to another individual. We thereby only store information, even at an intermediate stage, which is used for our intended purpose.

2.4.2 Hallucination

With any Generative Artificial Intelligence, there are understandably concerns that it may “hallucinate” (that is, to invent facts not borne out by the evidence). While this is never entirely preventable, we do our utmost to prevent these occurrences.

Any data passed into the AI is tagged to its exact source ID and we require that any outputted claims are given a source. In output, all sources used to inform profile generation are listed in a bibliography. This allows for manual verification by the client, if desired, by retracing the steps taken by the AI to reach its conclusion.

We do not recommend that outputted data be automatically used to update the existing CRM held by the client without further verification. Instead, it should be uploaded as “likely”, with a tag indicating the provenance (i.e., us).

2.4.3 AI models used and related third-party Privacy Policies

We only use LLMs produced by Anthropic/Claude. We are currently using two separate models at various stages: Haiku 4.5 and Sonnet 4.5. These are accessed through the Anthropic API, with appropriate endpoints.

Anthropic does not use API inputs or outputs for model training.

Anthropic automatically deletes API inputs and outputs from their backend systems within 30 days of receipt or generation. The tool does not store conversation history, so each prompt is treated as a new, independent session (we pass new context in each time we prompt).

Anthropic provides one exception to their standard 30-day retention window: if a prompt or response is flagged by Anthropic’s trust and safety systems as a potential violation of their [Usage Policy](#), that content may be retained for up to 2 years. Violations of this Usage Policy typically include malicious activity towards others, indications of criminality, and threats to national security, so should not relate to us.

For full details on how Anthropic handles data on their end, please refer to the [Anthropic Privacy Policy](#).

We frequently review Anthropic’s Privacy Policy and track any updates to ensure that the facts above do not change. If it becomes noncompliant with our Policy, we will immediately suspend usage of all Anthropic models and review potential alternatives. While doing so, we will communicate with clients to discuss alternatives.

2.5 Output Data Retention and Continued Relationship

Our most complete functionality is provided if we maintain a working relationship with a client over an extended period. If we have performed an initial bulk data enrichment and rating, then other complementary services can be subsequently provided. This includes the aforementioned research on the alumni base, mentoring allocations, and further due diligence. Following this first enrichment, it is also much less complex to provide continued updates on a periodic basis on factors relating to trusteeships, officer positions held, and employment. This is because, following initial enrichment, we have already determined a series of identifying codes (e.g. Trustee or Officer IDs), to enable quick retrieval of updates.

We do not store any of these codes once any service of ours has been rendered. Instead, alongside any other output we provide to the client, we provide a complete log of searches undertaken, and all relevant data relating to individuals in an easily-parseable format. Once our services are called upon again, we will use this detailed log to set up the system to where we left off, and be able to build on any previous work done. We are thereby able to have a long-lasting, productive relationship with clients, whilst only retaining data on a short-term basis.

2.5 Opt-out by alumni

We will never use or attempt to enrich data from an alumnus/alumna if the client has marked that they have opted out of background and/or automated research, in line with GDPR.

3. Data provided by our clients

Information provided by our clients has two components:

1. Information on the clients themselves (e.g. contact details)
2. Information for use in research (that is, input data on alumni)

For neither type of data do we collect, nor do we store, that which is classified as “sensitive personal data” (also referred to as “special category data”) under GDPR and the Data Protection Act 2018, unless the conditions for processing such data are met, or there are more substantial public interest conditions, as outlined in DPA 2018. Except perhaps in exceptional circumstances, we do not anticipate that our work will satisfy these public interest conditions, and so we do not expect to store any “sensitive personal data”. If we do so, then this will be flagged and justified in terms of which of the 23 public interest conditions is/are satisfied.

3.1. Data we collect and store on our clients

By providing personal information to AlmaReach, you consent to the collection and use of your personal information as set out in this Privacy Policy.

If you are a current or past client, or a business contact, you have the right to let us know how you prefer to be contacted (mail, phone, text or email).

Information supplied to us (including contact details), whether by email or other means, will be stored securely. We will use this information for the purposes of communicating with you about any business we are conducting for you, and to inform you about our services.

You can opt-out of receiving new communications from us, or you can ask us to delete any information we hold on you at any time – pending contract resolution – by emailing support@almareach.co.uk.

Everyone has a right to know whether we hold personal information about them, and a right to be provided with said data, in accordance with the Data Protection Act. You can request the personal information we have stored on you at any time by emailing support@almareach.co.uk.

We will never share your data with any third parties for marketing purposes.

When you opt out of all future communications or exercise your right to data erasure, we will continue to maintain a skeleton record of personal data (name and organisation), to ensure we do not inadvertently contact you in future.

3.2. Data clients provide for research services

Use of our research services will require a client to send us some background personal data on individuals. All intellectual property in client data remains entirely the property of the client, and no client data is transferred or otherwise subsumed in any way into any database belonging to AlmaReach.

Client data is kept no longer than is necessary. We will delete any data sent to us as soon as the contracted work has been completed, unless instructed otherwise.

AlmaReach will not sell, share, transfer or disclose any such information to a third party unless authorised to do so by the client or if required to do so by law.

3.3. Complaints

You have the right to complain to us about the way in which we process your data.

You also have the right to complain to the Information Commissioner's Office (ICO), with whom we are registered about the way in which we have processed your data. Contact details are available on the ICO website at: <https://ico.org.uk/>

4. Our general commitment to data protection and compliance

At AlmaReach, we are committed to handling all forms of personal data securely and respectfully. We comply with the Data Protection Act (2018) (DPA 2018) and the General Data Protection Regulation (GDPR), both of which took effect in the UK from 25 May 2018. AlmaReach is registered with the Information Commissioner's Office (ICO).

We undertake all tasks by following accepted best-practice policies and procedures when processing personal data.

Data protection reviews are regularly carried out, and we keep up to date with legislation, regulation and trends in good data management through updates from the Information Commissioner's Office.

All personal data is processed in the strictest confidence and is stored on encrypted hard drives which are UK-based and managed. Our email, folders, and files system require two-step authentication. We will never transfer personal data outside of the UK, unless instructed to do so by the client.

- We always protect research, reports, spreadsheets, and any other related data with passwords before sending them by email to the client.
- We never store on mobile devices the data we collect through research using publicly available sources, nor any personal data or information which is provided to us by our clients.
- We may store basic personal contact information of clients and other business contacts on mobile devices which are protected with passwords and pin numbers.

We may keep a skeleton record of work completed for the purposes of invoicing and for our clients' and our own historical records.