



# Privacy Policy

Last Updated: 10th July 2024

## Who are we?

We are a direct marketing organisation called Data Locator Group Ltd “DLG” registered in England and Wales under company registration number 06742075, whose registered office is at Green Heys, Walford Road, Ross-On-Wye, Herefordshire, HR9 5DB and is a subsidiary of DM Ltd.

We are registered with the Information Commissioners Office under registration number Z1562157.

We collect and process personal data to help organisations better communicate with individuals. We operate under the brand names *Surveys.co.uk*, *Consumer Lifestyles™* and *ThePrizeFinder.com*, and we run marketing surveys on behalf of some of the leading UK brands to help them target their products and services better. We conduct marketing surveys both online and by telephone. When we call you we will always display a valid telephone number to identify us. You are always able to call this number back to stop any future calls if that is your wish.

Our offices are at Sunningdale, The Belfry Business Park, 13 Colonial Way, Watford, Hertfordshire, WD24 4WH and you can contact us by phone on 01923 281700 where you can speak to the Compliance Department or email [consumerdataprotection@dlg.co.uk](mailto:consumerdataprotection@dlg.co.uk) with your questions. If you want to check if we have called you in the last 2 weeks you can check this by going to our website [www.consumerlifestyles.co.uk](http://www.consumerlifestyles.co.uk).

## What categories of personal data do we collect and share?

Personal data means any information that can be used to identify directly or indirectly a specific individual. During the course of completing a marketing survey we collect different types of personal data from you. This data can be categorised into four types:

Category	Description
Demographic	This relates to basic information such as your gender, name, date of birth and contact details.
Life stage	This relates to information such as marital status, type of employment, household income and presence of children.
Lifestyle	This relates to your likes and dislikes or your hobbies and interests, e.g. whether you like to travel.
Purchase intent	This relates to things like reducing your household bills or making home improvements.





Special category data is personal data that needs more protection because it might be considered more sensitive or private. We will never collect special category data such as medical history, religious or political beliefs and nor will we collect information such as your bank account or credit card details.

You are never obliged to provide your personal information or complete a marketing survey. If you do decide to complete a marketing survey, you always have the right to refuse to answer any specific question. You can also remove your permission at a later date, see the *What are your rights?* section for more detail.

## What do we use your data for?

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The data that you provide us is for the following purposes:

**Direct Marketing** - our brands *Consumer Lifestyles™*, *Surveys.co.uk* or *ThePrizeFinder.com* will contact you by email, SMS or telephone to ask you questions for marketing purposes. We also share your details with selected companies who want to contact you by telephone and post to offer you goods and services that we believe will be of benefit to you.

**Profiling** - we will profile your information for marketing purposes to help our clients deliver marketing communication that is more relevant to you. Profiling analyses aspects of an individual's lifestyle, behaviour, and interests to make predictions on whether you might find our clients' offers and products interesting. We will never make automated decisions about you which would have a negative impact on your rights. Our partners may use your data for tailored advertising, measurement of the effectiveness of the advertising, and identity resolution (i.e., recognition)

**ID Protection & Tracing** - we will also share your details with credit reference and identity verification organisations which help other organisations verify your identity and prevent others from misusing your details.

You can ask us to stop processing or sharing your details at any time now or in the future.

In writing to: The Data Protection Officer, Data Locator Group Ltd, Sunningdale, The Belfry Business Park, 13 Colonial Way, Watford, Hertfordshire, WD24 4WH;

By email to: [compliance@dlg.co.uk](mailto:compliance@dlg.co.uk); or online at [www.consumerlifestyles.co.uk](http://www.consumerlifestyles.co.uk)

By telephone on: 01923 281700

## What will happen if you share your personal data?

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The purpose of this section is to explain what may happen if you share your personal data with us.

**Marketing** - Marketers do not want to bombard individuals with wasted communication. It is costly, frustrating and can waste everyone's time. Therefore, sharing your data helps marketers improve how they target their communications better, which in turn helps you obtain access to products and services that may be of interest or may help you to save money - for example, if you tell us that you want to reduce your monthly household bills, then you may be contacted to provide a quote for cheaper energy supply. In short, by sharing your personal data with us you will be more likely to receive marketing that is relevant to you and your interests. It does not mean that you will receive more marketing messages, just more that is suited to you.

**Profiling** - Personal data can also help organisations better understand their customers. By considering their likes and dislikes and their hobbies and interests they are able to build a clearer picture of their



audience, which can then help them develop better and more relevant products and services or target their marketing communication more effectively.

**ID Protection & Tracing** - sharing your data with identity tracing and credit reference agencies is for non-marketing purposes. ID protection and tracing helps prevent fraud or helps clients trace individuals for purposes such as asset recovery or asset reunification. Credit reference services promote responsible lending or prevents over-indebtedness.

By sharing your personal data with responsible organisations you can receive positive benefits, choice and access to relevant offers. When we do share your details, we do so under strict licence terms and for specified purposes only. However, you should always ensure that you are provided with a clear and transparent description of how and why your data will be processed. As a data subject you will always remain in control of your data - please refer to the section '*What are your rights?*'.

## What legal basis do we use for processing your data?

Your data must be processed by us using one of the valid legal bases defined by the Regulations. When you provide your personal data we process this using two different legal basis depending on the purpose; either consent or legitimate interests. We will never switch from one legal basis to another without your permission. The different purposes are summarised in the table below:

Purpose	For use by ourselves	For use by third parties (our clients)
Marketing – by email	Consent	Consent – but only when you provide specific consent for a named organisation.
Marketing – by SMS	Consent	Consent – but only when you provide specific consent for a named organisation.
Marketing - telephone	Consent - where your number is registered on the Telephone Preference Service.  Legitimate Interest – where your number is not registered on the Telephone Preference Service.	Consent – but only when you provide specific consent for a named organisation.  Legitimate Interest - where your number is not registered on the Telephone Preference Service.
Marketing – by post	Legitimate Interest - where you are registered on the Mailing Preference Service we will ask for your specific consent.	Legitimate Interest - where you are registered on the Mailing Preference Service we will ask for your specific consent.
Marketing – online (e.g. via social media)	Legitimate Interest	Legitimate Interest
Marketing – by TV	Legitimate Interest	Legitimate Interest

Tracing, ID verification and credit reference	Legitimate Interest	Legitimate Interest
Profiling and analytics	Legitimate Interest	Legitimate Interest
Service messaging – by email	Legitimate Interest	Contract/Legitimate Interest
Service messaging – by post and email	Legitimate Interest	Contract/Legitimate Interest

### Consent

In short this is where you consent to a specific organisation, to contact you by a specific communication channel(s) for a specific reason, which in the context of our processing will be for marketing purposes. When we ask for your consent, we will do so by giving you the opportunity to tick a box online or answer a question on the phone. You can of course withdraw your consent at any time and we will describe how later on in this policy.

Examples of where we use consent:

- We obtain consent for our brands (including surveys.co.uk, Consumer Lifestyles and ThePrizefinder.com) to contact you by telephone where your number is registered on the Telephone Preference Service (TPS) or by email and SMS.
- To pass your contact details to named third parties where Privacy and Electronic Communications Regulation (PECR) applies such as email marketing, SMS marketing or where your telephone number is registered with the TPS.
- To pass your contact details to named third parties where your postal address is registered with the Mailing Preference Service (MPS).
- Where our client has specifically asked us to gain your consent to pass on your details.
- All cookies & similar technologies which do not meet the “strictly necessary” exemption under PECR.

When we obtain your consent, we will explain *who* the consent is for (e.g. which brand or organisation), *how* you will be contacted (e.g. by email or by telephone) and *why* (e.g. to provide a cheaper quote). We will provide your information to the brand or organisation who can only use your personal information for the purposes that you have provided your consent for. You are able to withdraw your consent at any time. See the section *What are your rights?* for further information.

### Legitimate Interest

As a direct marketing organisation we process personal information for various legitimate business purposes which include some or all of the following:

- To help make the communication more relevant
- To provide direct marketing communications which we think will be of interest to you
- To enhance our services for the benefit of our clients including verification and validation
- To better understand how our clients interact with our services
- To determine the effectiveness of our and our clients’ promotional campaigns



- To identify and prevent fraud

These legitimate business purposes relate to the following activities:

- **Direct Marketing** - Postal and telephone marketing by both DLG and its brands (including surveys.co.uk, Consumer Lifestyles and ThePrizefinder.com and other third parties, but in either case communications will be in relation to products or services which we believe are of interest to you based upon information which you have provided us.
- **Social Media Advertising** – Using data provided by you to serve advertising to you on social media platforms such as FaceBook.
- **Addressable TV Advertising** - A form of television advertising where advertisers are able to target video adverts to specific households during scheduled TV programmes. Relevant advertisements are then shown while you are watching TV either on-demand, live-streaming or traditional television viewing.
- **Profiling** - We will profile your information for marketing purposes to help our clients deliver marketing communication that is more relevant to you (for more information, please refer to the profiling section)

We also share anonymised data with third parties that we collaborate with to optimize campaign performance and display online adverts to you. The personal information is hashed using the latest and most secure technology, hashing refers to the process of transforming data to a combination of numbers and letters which cannot be recognised or decoded so it is not considered personal data as it has been anonymised.

We also collect information when you visit our site using cookies and similar technologies. Should you prefer not to share such information, you can select your preferred options on this website by selecting the “Cookie Settings” shown at the bottom left-hand corner of this site.

- **ID Protection & Tracing** - This is in relation to appropriate agencies which we have listed below which could help protect your identity and prevent fraud.

We process your data in the following ways:

- To pass on your personal information to our clients for marketing purposes who will send postal marketing to you, (except where you are registered with the MPS) or contact you by telephone (except where you are registered with the TPS). Marketing will only ever be from organisations operating within the industry sectors described below.
- To call you where your telephone number is not registered on the TPS.
- To call you where we have obtained your details from a third party. We will always be named within their privacy policy as a party to whom they share your information; once contact is made we will obtain your consent at the earliest opportunity. You will always be given the option to opt out should you not wish to hear from us again.
- To process your personal information for the purposes of customer analysis, non-automated profiling and direct marketing, to help us with our activities and to provide you with the most relevant information as long as this does not harm any of your rights and interests.
- To pass to our clients for use including tracing of individuals, verification and/or validation of the identity of individuals for the purposes of, but not limited to, anti-money laundering regulations, national security, crime prevention and detection, anti-fraud processes, asset recovery and asset reunification. More information on this can be found in the *Credit References and other Agencies* section.



- To determine the effectiveness of our clients' promotional campaigns and advertising, and to develop our products, services, systems and relationships with you.
- Processing your information to protect you against fraud when using our website, and to ensure our websites and systems are secure.

To pass on your details to companies to help their clients tailor products and services which best suit your needs. They will also use your data for fraud prevention. More information on this can be found in the *Marketing Services Providers* section.

- To pass some of your details to social media platforms such as Facebook and TV advertising platforms to understand if you use that platform. This is known as matching or linkage. If you do use that platform, we may ask it to show you relevant advertising which we think will be of interest to you based on the information you have previously provided us. If your data does not match, the platform will immediately delete it. The platform will typically match based on email address, postal address or IP address. They will act as processor and will not share the Data with third parties or other advertisers. They will delete the Data promptly after the match process is complete. The platform will maintain the confidentiality and security of the Data by maintaining technical and physical safeguards that are designed to (a) protect the security and integrity of data while it is within the platform's systems and (b) guard against the accidental or unauthorised access, use, alteration or disclosure of data within its systems.

It is important that we keep your details up to date, therefore we use various methods such as Quick Address Systems (QAS) which is a service provided by Experian Ltd, National Change of Address (NCOA®) which uses information taken directly from the redirection application forms of people who are moving and the Edited Electoral Register (EER) which contains the names and addresses of those voters who have indicated that their details can be used for a purpose other than electoral or statutory use, e.g. for direct marketing use by a commercial or other organisation. Further information can be found in the section *Do we collect data from other sources?*

For all types of processing, we apply various measures to carefully protect your privacy rights. In considering the most appropriate legal basis, DLG conducted Legitimate Interest Assessments. These are detailed evaluations of each type of data processing activity to ensure that we have balanced the need of the processing against the rights of the individual to ensure minimal privacy impact. This documentation is available by writing to: The Data Protection Officer, Data Locator Group Ltd, Sunningdale, The Belfry Business Park, 13 Colonial Way, Watford, Hertfordshire, WD24 4WH; or by email to: [compliance@dlg.co.uk](mailto:compliance@dlg.co.uk);

As with all your data you can also object to us processing your data in this way. Your rights are detailed below.

## Who do we share your data with?

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- A. Our Group of Companies and Brands
- B. Groups of recipients within the specific industry sectors listed
- C. Marketing Service Providers
- D. Named Clients
- E. Credit Reference Agencies
- F. Organisations regulated by the Financial Conduct Authority (FCA)



**A. Our Group Companies and brands;**

Data Locator Group Ltd and its brands Surveys.co.uk, ThePrizefinder.com and Consumer Lifestyles™

PDV Ltd - PDV is a Data Processor working on behalf of Data Controllers to store, prepare and share data with reputable UK businesses for marketing purposes. PDV works under instruction of the Data Controllers, such as Data Locator Group, who collect information directly from you. To object to the processing of your information please contact PDV by telephone on 0800 093 1551 or by email at client.services@pdvlt.com

Transactis 2017 Ltd is a direct marketing co-operative bringing together customer information on behalf of UK retailers. Participating retailers specialise in clothing, collectables, food & wine, gardening, gadgets & entertainment, health & beauty and household goods. Transactis analyses this information on behalf of the retailers to help them better understand consumers' interests and wider buying patterns. Marketing communication will only ever be by post.

MyOffers 2019 Ltd is a data controller that collects data online. Users enter a variety of competitions and prize draws and gain access to special offers and money saving opportunities. We may share data with MyOffers as it is a service we think may be of interest. You are never obligated to receive marketing communication from MyOffers.

**B. Groups of recipients within specific industry sectors listed below;**

Industry Sector	Examples include, but not limited to:
Automotive	e.g. car manufacturers, test drives, servicing, breakdown cover
Charity	e.g. animal welfare, disaster relief, children's medical, elderly, environmental, health
Gaming	e.g. bingo, betting, competitions, lottery
Leisure	e.g. food & drink, events, museums, cinema
Financial Products	e.g. banking, credit cards, investments, loans, mortgages, debt management, tax/accountancy services, funeral plans
Insurance	e.g. car, home, life, medical, pet, income protection, travel, warranty products.
Health / Mobility	e.g. fitness, beauty, opticians, hearing, care homes, mobility
Home Improvements	e.g. house moving, blinds & curtains, insulation, boilers, conservatories, doors & windows, extensions, gardens, solar panels, home security systems, home appliances and the repair thereof.
Wills	e.g. writing new Wills or reviewing existing Wills
Mail Order	e.g. catalogues, online retailers
Market Research	e.g. to gather information about consumers' opinions and preferences
Media	e.g. online, television, radio, newspapers, magazines
Retail	e.g. fashion, groceries, electrical goods, comparison sites, discounts, FMCG, nicotine and smoking alternatives

<b>Telecoms</b>	e.g. landline, mobile phones, broadband, digital TV
<b>Travel</b>	e.g. long haul holidays, city breaks, flights, UK breaks, accommodation
<b>Education</b>	e.g. online tutoring, personal development, academic camps.
<b>Utilities</b>	e.g. gas & electricity switching, other household utilities such as water

From time to time, we also supply data to these sectors via agencies/brokers; we ensure that these agencies/brokers are reputable firms. When we share data with organisations by industry sector, we do so using legitimate interests.

**Marketing Service Providers** are companies who collect data from Data Controllers, such as ourselves, and help their clients tailor products and services which best suit your needs.

We will share your data with the Marketing Services Providers listed below, who will use it for a variety of direct marketing purposes. Marketing Services Providers carry out data profiling. They will combine your data with data they get from other sources to create models to try to predict behaviour and preferences (e.g. how likely you are to buy a holiday online or take a particular type of holiday) or likely circumstances (e.g. whether you are eligible for a particular credit card). Marketing Services Providers will also try to match and then link your data with data that they receive about you from other sources, to make sure that the data they hold about you is correct (e.g. to check whether you have recently moved address) or keep the IP address they hold about you up to date. IP addresses change regularly. The IP address they receive from us might change too quickly to make the data you provide through us useful for marketing purposes. Marketing Services Provider might find it helpful for this to be refreshed from time to time to ensure marketing messages are being delivered to the correct consumers, on the correct device(s). They share your data, including the profiled data they have created about you, primarily to:

- help organisations better understand the likely characteristics of their customers (and find others like them);
- improve the relevancy and appropriateness of an organisation’s marketing to its customers (e.g. offers, its products and services); and
- help them communicate with their customers more effectively offline and online. This may mean that you receive tailored advertising via direct mail, when you visit a website, via a mobile app or watch TV. The Marketing Services Providers will not however advertise their own products or services to you.

We do not share information such as cookies. However, Marketing Service Providers may link the personal information we share with them to cookies stored on your browser or device, but only if you have already provided the necessary permissions.

In sharing your data with Marketing Services Providers, we rely on ‘legitimate interest’, as our business depends on our ability to partner with third parties who process personal data for marketing-related reasons. To understand more about the use of your data by Marketing Services Providers, and to find out how to exercise your data protection rights in relation to their use of your data (including how to opt-out), please click through to the websites of the companies below:

- Experian Ltd - We share this data with Experian who will use it to create products and services to help organisations better understand the likely characteristics of their customers; communicate with them more effectively; and find others like them across a range of marketing channels. This may mean that you receive advertising that is more relevant to you



via direct mail or when you visit a website. <https://www.experian.co.uk/privacy/consumer-information-portal>

- Sagacity Solutions Limited - <https://www.mydatachoices.co.uk/Privacy>
- CACI Limited - CACI will use your data to help them develop marketing products such as Ocean and Fresco. Ocean and Fresco. are used by leading brands to provide insight on their customers and prospects so they can better understand the kinds of products and services you would be interested in This will help them communicate more effectively with you. CACI may also share your data with their digital partners to help target the right ads to the right people across the internet from websites to social media. To find out more information about CACI and to exercise your rights as a data subject please visit CACI - <https://www.caci.co.uk/data-privacy/consumer-information/>
- Acxiom Ltd - <https://www.acxiom.co.uk/about-acxiom/privacy/uk-privacy-policy/>
- Liveramp UK Limited - <https://liveramp.uk/privacy/>
- Kinesso Limited - Kinesso provides digital marketing, advertising solutions, and technology services that help our clients connect and engage with people in more respectful and beneficial ways. Our services help us reconcile disparate sets of data and connect our clients to their customers and prospective customers in connected channels, such as websites, mobile apps, and connected TV. To learn more or opt out of Kinesso's products and services, please visit: Kinesso Ltd - <https://kinesso.com/products-services-privacy-notice/>

### C. Named Clients

In addition to organisations that fall within industry sectors listed in section B, we also supply data to the following clients who have specifically asked to be named below. Data is supplied using legitimate interests and all clients will use your information in line with our privacy policy for marketing purposes. This may mean that you receive advertising from them in relation to products or services which we believe are of interest to you based upon the information which you have provided us. To understand more about the products or services they offer please click through to their websites using the links below.

Client	Description
<b>Sky UK Limited</b>	Sky UK Limited may use your information to contact you by phone about its products and services. Sky relies on legitimate interests as its legal basis for processing your data. You can find out more about how Sky uses your personal data and how you can opt-out by visiting Sky's Privacy Centre at the link below. <a href="#">Visit website</a>
<b>British Telecommunications plc</b>	British Telecommunications plc may use information about you to provide you with details of our products and services which we think may be of interest to you. You can opt out of receiving marketing from us at any time. You can do so by using the link under 'Want to change your marketing preferences?' in the BT privacy policy or by email or post using the contact details in that policy. We will not send you marketing via the post if you are registered on the Mailing Preference Service. We rely on our legitimate interests as the legal basis for processing your data for postal marketing. At BT, we take your privacy seriously. For more information on how BT uses your personal data, and your data privacy rights, please see our privacy policy at <a href="https://www.bt.com/privacy-policy/">https://www.bt.com/privacy-policy/</a> .
<b>The Consumer Data Research Centre</b>	The Consumer Data Research Centre is an initiative funded by the Economic and Social Research Council. It was established in 2014 to lead academic engagement between industry and the social

	<p>sciences and to utilise consumer data for academic research purposes.</p> <p>The CDRC brings together world-class researchers from the University of Leeds, University College London, the University of Liverpool and the University of Oxford to provide unique insights into a diverse range of societal and economic challenges. The data is used to create reports and analysis for academic research and government policy. For more information see the privacy Notice here: <a href="https://www.cdrc.ac.uk/privacy-notice-cdrc-acquired-data/">https://www.cdrc.ac.uk/privacy-notice-cdrc-acquired-data/</a>.</p>
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### E. Credit Reference and Other Agencies

We will also share your details with credit reference and identity verification organisations which help other organisations verify your identity and prevent others from misusing your details. We share data using the legal basis of legitimate interests. These organisations will have a relationship with you or need to use your information where they have a lawful reason, which will include these organisations' own legitimate interest. Use includes tracing of individuals, verification and/or validation of the identity of individuals for the purposes of, but not limited to, anti-money laundering regulations, national security, crime prevention and detection, anti-fraud processes, asset recovery and asset reunification. You have the right to object to this processing at any time by contacting us at [consumerdataprotection@dlg.co.uk](mailto:consumerdataprotection@dlg.co.uk). The companies with whom we share your details for such non-marketing purposes are; Experian Ltd, Tracesmart Limited trading as LexisNexis, Sagacity Solutions Ltd and GB Group plc.

### F. Organisations regulated by the Financial Conduct Authority (FCA)

In addition to organisations that fall within the industry sectors listed in section B, we may also supply data to organisations that are regulated by the FCA. This includes organisations that offer pre-paid funeral plans. Data is supplied using the legal basis legitimate interests and clients will use your information in line with our privacy policy for marketing purposes only. In supplying this information, we in no way advise, recommend, arrange, or distribute financial services provided by an FCA authorised firm, nor are we incentivised on the basis of how many financial policies are sold. If you have any concerns, you should always take independent advice. Please see [www.fca.org.uk](http://www.fca.org.uk) for further information.

## What is Profiling?

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Profiling enables organisations to better understand who their customers are so they can make their marketing communications more relevant.

We use the information you provide to match with our clients' data so that they will better understand the characteristics of their customers, such as age, hobbies and interests. This only happens when you are both on DLG's database and you are a customer of our client.

We do not give them specific information about you, but we will tell them how many of their customers are male/female or live in a certain city. We also help identify whether or not you have similar attributes to a typical customer of our client, so they can target you with offers of goods and services tailored to you.



Profiling then enables organisations to segment or group people based on characteristics they may have in common with others. An organisation can then tailor their marketing communication accordingly. For example, if a client is marketing car insurance for new drivers, targeting people based on age would prevent contacting older people who may have been driving for some time.

Profiling has many benefits for individuals. It can provide access to products or services more likely to be of interest to them, they can receive relevant offers and improved trust in the way personal data is being used. It may also help reduce nuisance caused by receiving products and offers that are not relevant or targeted correctly.

However, the ICO states that profiling could restrict the individual's freedom to choose or cause discrimination. Therefore, before carrying out profiling on behalf of our clients, we conduct due diligence to ensure that the purpose remains in line with the information set out in this privacy notice. We will also never profile you on the basis of ethnicity, religion, politics or health as these are not valid reasons for which you should be targeted for marketing purposes and nor do we collect this information.

We also do not make automated decisions about you which have a negative impact on your rights. Marketing Services Providers we share your data with can also use profiling to target you for marketing purposes. Once again you can ask us to stop using your data in this way at any time.

## Do we transfer your data to other countries?

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Whilst we use overseas call centres to conduct surveys on our behalf, your data is never sent to them but held on secure servers here in the UK. Our call centres are able to access your information in order to conduct surveys on our behalf, under our strict instructions but they are not able to save or download your data into their own systems.

Whilst the majority of our business is with client's resident in the UK we do have some clients based outside of the UK and EEA. Where their local privacy laws have not been approved by the UK and EEA, transfers are made subject to contracts which include Standard Contractual Clauses also known as Model Clauses, approved by the UK and EEA, designed to protect your rights and freedoms under the Applicable Laws here in the United Kingdom.

## How long will we keep your data for?

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We take your data privacy rights seriously. Whilst the law does not put a time limit on the amount of time we should hold your personal data, DLG only wishes to retain data for as long as it is required for the purposes for which it was collected; for as long as it remains accurate and up-to-date; and most importantly, for as long as you are happy for us to do so.

In addition, to help DLG maintain the most recent indication of your marketing and data processing preferences, we will provide you with ongoing reminders of your data subject rights with access to this privacy policy. We refer to this as engagement or notification recency. Therefore, our data retention policy considers the purpose, the legal basis under which it is processed and also the most recent engagement.

- **Marketing** – where we process your data under consent we will stop using it for marketing purposes after five years. Where we rely on legitimate interest we will continue to process your data for ten years, subject to receiving notification from ourselves that we hold your information.
- **Profiling** – we will stop using your data for this purpose after ten years.



- **Tracing and Credit Reference** – as this purpose plays an important function of protecting individuals, we will retain your data for twenty years. However, only basic name, date of birth and contact information is retained for this purpose.

In addition, when completing a lifestyle survey you may provide us with information such as the make and model of your car or the newspaper you read. Where information such as this has less use over time, it will be removed sooner than the retention periods detailed above.

It is important that the personal data we hold and process is accurate and up-to-date. Therefore, we regularly refresh the database against suppression lists and remove those who no longer wish to be contacted. As we explain in the section marked *What are your rights?* you can withdraw your consent to us at any time.

## Do we collect data from other sources?

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In order to keep consumer records as up to date as possible we use third party products to help us verify and suppress data.

- Experian QAS, supplied by Experian PLC, is a data verification service. It uses the Edited Electoral Roll and details given by multiple companies to re-verify consumer information.
- Telephone Preference Service (TPS) and Mailing Preference Service (MPS). Managed by the Data and Marketing Association (UK) Ltd, these are central registers of individual's who do not wish to receive unsolicited marketing calls or direct mail. You can register for these free of charge at <https://www.tpsonline.org.uk/> and [www.mpsonline.org.uk/](http://www.mpsonline.org.uk/)
- National Change of Address (NCOA®) which uses information taken directly from the Royal Mail redirection application forms of people who are moving.
- Mortascreen is a product of MiExact Ltd. It is data management solution and enables organisations to identify deceased records using verified notifications of death.
- Clients and other Data Controllers with whom we share data, will on occasion return data to us for the purpose of verification and accuracy. In line with GDPR, this enables us to erase or rectify data without delay.

From time to time, we will also use third parties to supply data subjects' personal information to us for marketing purposes.

- Other data controllers - where you have completed a marketing survey either online or by telephone and a DLG brand is named in their privacy policy as a company with whom they share information. DLG will typically rely on legitimate interest for this processing. Consent will only be relied upon with your express permission.
- Publicly available information relating to properties such as Energy Efficiency Ratings or land registry data. We use this information to try to tailor campaigns to your wants and needs where we can rather than sending mass mailings which may not interest you. As this is not considered personal data, a legal basis for processing is not required.
- Acorn, provided by CACI, is a consumer classification that segments UK households, postcodes and neighbourhoods into 6 categories, 18 groups and 62 types. population. Acorn is a postcode level tool rather than an individual level database. As this is not considered personal data, a legal basis for processing is not required.

When we do collect information from third parties, we always check that they have a valid legal basis to process and share your data with us.



## When do you have to share my data?

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On rare occasions we will be asked to share your information for the prevention of fraud or with regulatory bodies who are investigating a complaint made by a consumer.

## What are your rights?

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You have a number of rights under the law which include;

- A. Right to be informed** - When we collect your data we have to tell you what we are going to do with it primarily through this Privacy Policy and consent statement.
- B. Right of access** - You have the right to contact us verbally or in writing to request details of the information we hold about you.
- C. Right of rectification** - You have the right to ask us to rectify information that we hold about you if it is inaccurate or incomplete.
- D. Right to erasure** - This is also known as the right to be forgotten and gives you the right to request your information be removed if there is no compelling reason for its continued processing. A word of warning though we keep a list of people who have asked not to be contacted which we use to ensure that you receive no further marketing from our group or clients as a result of our activity. Without this list your data could enter our system again from another source and we would have no record of the fact that you asked us not to contact you.
- E. Right to restrict processing** - this is the alternative to erasure and gives you the right to tell us to stop processing your data but allowing us to keep enough information about you to ensure that your wishes are respected in the future.
- F. Right to data portability** - this gives you the right to ask a holder of your information to transfer that information to another business. This right would most commonly used if you were switching banks, insurance companies, utilities companies and mobile phone providers.
- G. Right to object** - you have the right to object to the processing of your data for marketing purposes and profiling for marketing purposes. You also have the right to ask us to cease processing based on our legitimate interests, where there is no overriding justification for the processing of your data. Your rights and freedoms override our interests.
- H. Rights related to automated decision making including profiling** - we do not use automated decision making processes which would have a potentially damaging effect on you. But if we did you have the right to obtain human intervention, express your point of view, obtain an explanation of the decision and challenge it.
- I. Right to withdraw consent at any time where relevant** - you have the right to withdraw your consent to the processing of your information at any time and we must provide you with the information to need to do so, at the time we collect your data and each time we contact you. You can withdraw consent in the following ways;

In writing to: The Data Protection Officer, Data Locator Group Ltd, Sunningdale, The Belfry Business Park, 13 Colonial Way, Watford, Hertfordshire, WD24 4WH;

By email to: [compliance@dlg.co.uk](mailto:compliance@dlg.co.uk); or

By telephone on: 01923 281700



- J. Right to lodge a complaint with a supervisory authority** - If we cannot deal with your complaint to your satisfaction you also have the right to complain to a relevant supervisory authority which include;

The Information Commissioners Office; Wycliffe House, Water Lane, Wilmslow, SK9 5AF, or call: 0303 123 1113 or online at <https://ico.org.uk/make-a-complaint/> and

The Advertising Standards Authority - <https://www.asa.org.uk/make-a-complaint.html>