

Privacy Policy

Last Updated: 22nd December 2020

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.

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 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.

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?

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.

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; or online at www.consumerlifestyles.co.uk

By telephone on: 01923 281700

What will happen if you share your personal data?

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.
Tracing, ID verification and credit reference	Legitimate Interest	Legitimate Interest
Profiling and analytics	Legitimate Interest	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.
- **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)

- **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.

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;

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

Who we share your data with?

- 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

A. Our Group Companies and brands;

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

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

MyOffers 2019 Ltd

Accolade Publishing Ltd

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
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.
Wills	e.g. writing new Wills or reviewing existing Wills
Funeral Plans	e.g. to arrange and pay for a funeral in advance
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
Telecoms	e.g. landline, mobile phones, broadband, digital TV
Travel	e.g. long haul holidays, city breaks, flights, UK breaks, accommodation
Education	e.g. online tutoring, personal development, academic camps.
Utilities	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. The Marketing Services Providers we work with are strictly limited to only those organisations who we have completed checks on and who will process your data in strict compliance with all laws, regulations and guidance with regard to Data Protection. We will share your data under strict licence terms and using the legal basis of legitimate interests with the Marketing Services Providers listed below, who like us, 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 will mean that you receive advertising from organisations within the industry sectors listed above, that is more relevant to you via direct mail or when you visit a website, mobile app or watch TV. The Marketing Services Providers will not however advertise their own products or services to you. The data you share with us may be transferred to a US company which is certified under the Privacy Shield.

They link the personal information we share with them to cookies stored on your browser or device, which will collect information such as your IP address, browser or operating system type and version, and demographic or inferred-interest information

To understand more we have provided you with a link to each of the Marketing Services Providers listed below.

- Experian Ltd - <https://www.experian.co.uk/privacy/consumer-information-portal/>
- REaD Group Ltd - <https://www.mydatachoices.co.uk/Privacy>
- Acxiom Ltd - <https://www.acxiom.co.uk/about-acxiom/privacy/uk-privacy-policy/>
- Liveramp UK Limited - <https://liveramp.uk/privacy/>

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
CLC World Resorts & Hotels	CLC may contact you with discounted or free holiday offers as an incentive for attending a presentation at one of their Travel Centres. Visit website
Carphone Warehouse	Carphone Warehouse (CPW) will store your name, DOB, address and mobile number and then check your details with your mobile phone network provider to conduct an eligibility check. We will call you in the future once you are eligible for a mobile phone upgrade and/or call you about other CPW mobile phone and broadband related products. You will not be called if you are Telephone Preference Service registered and you can opt out of marketing at any time; please see our Direct marketing Charter for how you can opt out of our marketing. https://www.carphonewarehouse.com/terms-and-conditions/direct-marketing.html . CPW use 'legitimate interests' as the legal basis for processing your data and we will ensure that your privacy rights are not compromised." Visit website
Scottish Power	Scottish power uses your information to contact you to tell you how much you could save by switching to their tariffs or how to make use of energy-saving ideas. Visit website
Sky UK Limited	Sky UK Limited may use your information to contact you to provide details on offers available across its products. Visit website
British Telecommunications plc	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 https://www.bt.com/privacy-policy/ .

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. The companies with whom we share your details for such purposes are; Experian Ltd, LexisNexis Risk Solutions UK Limited and GB Group plc.



What is Profiling?

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?

We work with suppliers such as our Call Centres in the Philippines and India, who call you on our behalf to conduct our surveys under the name of Consumer Lifestyles™. These Call Centres act as our processors under strict instructions from ourselves. We monitor the calls they make to ensure quality is controlled and we regularly inspect their premises and check that security and data protection standards are of the highest quality. We also send data to clients who operate overseas, primarily in the United States and South Africa but under strict contract rules that ensure your personal details are only processed under the same laws that we operate under here in the UK by using one of these safeguards:

- Transfer data to a non-EEA country whose data protection laws have been approved by the European Commission as providing adequate protection for data subjects' rights.
- Put in place a contract with the recipient that means they must protect data to the same standards as the EEA. This is known as Model Contract Clauses.

How long will we keep your data for?

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?

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/
- 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 Wilmington Millennium Ltd. It is data management solution and enables organisations to identify deceased records using verified notifications of death.

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 relies on legitimate interest for this processing.
- Transactis 2017 Ltd – this is a direct marketing co-operative that supports the marketing activities of UK mail order retailers. Only matches between DLG and Transactis are identified. It is used by DLG to verify accuracy of its own data only. DLG relies on legitimate interest for this processing.
- 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?

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?

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; 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>