

# Privacy Policy

## Who are we?

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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 also members of the Direct Marketing Association and registered with the Information Commissioners Office and authorised by the Claims Management Regulator under number CRM22272.

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 do we use your data for?

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All of the data we collect from you is for marketing purposes. This means we share your details with reputable companies who may want to contact you by telephone to offer you goods and services that may be of benefit to you. You can ask us to stop sharing your details at any time now or in the future.

Our brands *Consumer Lifestyles™*, *Surveys.co.uk* or *ThePrizeFinder.com* may also contact you by email, SMS or telephone to ask you questions for marketing purposes. These questions will be on behalf of companies who we will name at the time of the call and who will only contact you if you **consent**. Again you can ask *Consumer Lifestyles™*, *Surveys.co.uk* or *ThePrizeFinder.com* to stop contacting you now or at any time in the future.

## Legitimate Interests

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Data may be processed in pursuance of legitimate interests. This includes using your data for postal and telephone marketing for ourselves or others but in either case communications will be in relation to products or services which we believe may be of interest to you based upon information which you have provided us.

It also includes processing your data for ID protection and tracing purposes such as Credit Reference and Fraud Prevention. This is in relation to appropriate agencies which we have listed below which could help protect your identity and prevent fraud.

As with all of your data you can also object to us processing your data in this way.

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

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The information we collect includes your name and contact information that you volunteer such as your telephone number, email address, mobile number and postal address. We may also ask you for your date of birth and during the course of our surveys details about your preferences likes and dislikes. We will never collect information about your bank account or credit card details and nor will we collect sensitive information such as your medical history, religious or political beliefs.

## Who may 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. Credit Reference Agencies
- E. Claims Management Companies

### A. Our Group Companies and brands;

Data Locator Group Ltd  
PDV Ltd  
Transactis (2017) Ltd  
Surveys.co.uk  
ThePrizeFinder.com  
FuneralPlanningExperts.com  
Consumer Lifestyles™  
Accolade Publishing Ltd

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

Automotive, Charity, Gaming, Leisure, Financial Products, Insurance, Health/Mobility, Home Improvements, Wills, Funeral Plans, Mail Order, Market Research, Media, Retail, Telecoms, Travel and Utilities. From time to time we also supply data to these sectors via agencies/brokers; we ensure that these agencies/brokers are reputable firms.

- C. 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. They may also use your data for fraud prevention. 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 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 may 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.

We and our partners may link the personal information we share with them to cookies stored on your browser or device, which may 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 - <http://www.experian.co.uk/marketing-services/about/marketing-data.html>

REaD Group Ltd - <https://www.mydatachoices.co.uk/privacy-policy>

Acxiom Ltd - <https://www.acxiom.co.uk/about-acxiom/privacy/uk-privacy-policy/>

Live Ramp (an Acxiom company) - <http://liveramp.uk/cookies-101/>

Merkle UK One Ltd - <https://www.merkleinc.com/getting-know-your-privacy-rights>

Oracle Ltd - <https://www.oracle.com/uk/legal/privacy/marketing-cloud-data-cloud-privacy-policy.html>

#### **D. Credit Reference and Other Agencies**

We collect your data and will share it with third parties. These organisations will have a relationship with you or it may be used where they have a lawful reason, which may include these organisations's 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 might share your details for such purposes are; Experian Ltd, LexisNexis Risk Solutions UK Limited and GB Group.

#### **E. Claims Management Companies**

Depending on the answers given by you, DLG may share your data with organisations specialising in Claims Management (Mis-sold PPI, Packaged Bank Accounts, Investments, Credit Card/Bank Charges, Mortgages and Pensions). DLG only work with organisations that are authorised by the Claims Management Regulator. You can find further information at [claimsregulation.gov.uk](http://claimsregulation.gov.uk). Our clients include: We Fight Any Claim Ltd, Claims Helpdesk Limited and Adlib Finance Limited trading as We Reclaim.

## **What is Profiling?**

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We use some of the information you provide to identify lookalikes so our clients can target you with offers of goods and services tailored to you. We will 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 may have a negative impact on your rights. Marketing Services Providers we share your data with may 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.

To withdraw your consent please write to: The Compliance Manager, 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

Or visit: [www.consumerlifestyles.co.uk](http://www.consumerlifestyles.co.uk)

## Do we transfer your data to other countries?

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We work with suppliers such as our Call Centres in the Philippines, India, Kosovo and Guyana who may 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 may 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.

## How long will we keep your data for?

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We will only keep your personal details for as long as is necessary or as long as you want. The law does not put a time limit on the amount of time we should hold your personal details for but as long as you are happy to hear from us we will continue to contact you. As we explain in the section marked what are my rights? You can withdraw your consent to us at any time.

## What are your rights?

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

- A. Right to be informed
- B. Right of access
- C. Right to rectification
- D. Right to erasure
- E. Right to restriction of processing
- F. Right to data portability
- G. Right to object
- H. Rights related to automated individual decision-making, including profiling
- I. Right to withdraw consent at any time where relevant
- J. Right to lodge a complaint with a supervisory authority

**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 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 Compliance Manager, 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 <https://ico.org.uk/concerns/>
- The Claims Management Regulator <https://www.gov.uk/complain-about-claims-company>
- The Direct Marketing Association <https://dma.org.uk/contact>, and
- The Advertising Standards Authority - <https://www.asa.org.uk/make-a-complaint.html>

## **Do we collect data from other sources?**

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Occasionally we collect personal information from third parties but when we do we check that they have your consent to share your information with us.

## **When do you have to share my data?**

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

## **Cookie Policy**

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We may obtain information about your general internet usage by using a cookie file which is stored on your browser or the hard drive of your computer. Cookies contain information that is transferred to

your computer's hard drive. They help us to improve our site and to deliver a better and more personalised service. Some of the cookies we use are essential for the site to operate.

| Cookie                                                                                                                                    | Name         | Purpose                                                                                                                                                                        |
|-------------------------------------------------------------------------------------------------------------------------------------------|--------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>ASP.NET_SessionId</b><br>(Identifies users session on server)                                                                          | _aidcookie   | contains Affiliate ID                                                                                                                                                          |
|                                                                                                                                           | _contact_num | contact number of current person filling in the survey                                                                                                                         |
|                                                                                                                                           | _cookie      | checking of input if valid                                                                                                                                                     |
|                                                                                                                                           | _ega         | age of user                                                                                                                                                                    |
|                                                                                                                                           | _qahash      | Question Answer Hash                                                                                                                                                           |
|                                                                                                                                           | _qt          | Value to determine what part of the survey they are currently in                                                                                                               |
|                                                                                                                                           | _vh          | Unique Identifier for the person who filled in the survey on site                                                                                                              |
| <b>Google analytics</b><br>(uses cookies to provide meaningful reports about site visitors. They do not collect the user's personal data) | __utma       | Identifies users and sessions e.g. amount of visits (for each visitor), the time of the first visit, the previous visit, and the current visit                                 |
|                                                                                                                                           | __utmb       | Identifies new sessions/visits e.g. page views                                                                                                                                 |
|                                                                                                                                           | __utmc       | Works in conjunction with __utmb to determine whether the user was in a new session/visit                                                                                      |
|                                                                                                                                           | __utmz       | Stores entry point into the site - the traffic source or campaign that explains how the user reached your site. E.g. search engine, search keyword, link from another site etc |
|                                                                                                                                           | __utmz       | Used for A/B or multivariate testing using Google web optimiser                                                                                                                |

Please note that our advertisers may also use cookies, over which we have no control. You can block cookies by activating the setting on your browser which allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies as soon you visit our site.

## Prize Draw Terms and Conditions

### WIN £500 PRIZE DRAW TERMS AND CONDITIONS

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The promotions are run by DLG in conjunction with a number of companies and websites including Surveys.co.uk, Consumer Lifestyles™ and ThePrizeFinder.com.

The promotion is a prize draw, which is open to all UK residents over 18, except for employees of DLG and DM Ltd, their families and anyone else who is professionally associated with this draw. No purchase necessary.

The inclusion of brands in DLG's prize draws in no way means that these brands are endorsing DLG or its surveys at any time.

The following promotional periods will apply:-

1st January – 28th / 29th February

1st March – 30th April

1st May – 30th June

1st July – 31st August

1st September – 31st October

1st November – 31st December 2018

The themes within the promotion have individual closing dates throughout the year. Entries will be entered into the draw relevant to the date that the entry was received. The winning entry will be randomly selected from all the entries. The selection will be made on the first working day after the end of each promotional period by an independent adjudicator and their decision will be final and binding. For the avoidance of doubt, Monday to Friday are working days. Entries will be included into one draw only; entries will not be carried over into subsequent draws.

The prize is not transferable, unless agreed by DLG. If the alternative cash prize(s) is selected this will be paid as a lump sum(s) cheque payable to the winner(s).

The promoter accepts no responsibility for entries lost, damaged, delayed or unreadable. The judges' decision is final and no correspondence will be entered into.

The promoter reserves the right in its sole discretion to disqualify any individual that corrupts or affects the administration, security, fairness, integrity or proper conduct of this prize draw.

The winners will be notified by post and/or telephone before the last working day of the month following each promotional period. For example, the draw closes on 28th / 29th February 2018 and the winner will be notified by 31st March 2018. Winners must claim their prize within 28 days of being notified of the win. If the prize is not claimed within the specified claim period, your entitlement to that prize will be lost.

The prize remains the property of DLG until a winner is notified in writing and the winner has claimed the prize or the cash alternative.

In the event of a winner being unable to take receipt of the prize, upon agreement from DLG, he/she can nominate a family member or partner to take receipt of the prize on their behalf.



The prize will be despatched within thirty days of receiving a claim from the notified winner.

The name and county of the prize winner will be available after 120 days of the draw date to those sending a stamped addressed envelope marked 'Results' to Data Locator Group Ltd, Sunningdale, The Belfry Business Park, 13 Colonial Way, Watford, Hertfordshire WD24 4WH.

The winner agrees to the use of their name and photograph for the purpose of publicity, without any additional remuneration.

The prize will be provided by DLG. In the event of circumstances outside its control, DLG reserves the right to substitute the prize for another prize of its choosing which has a value the same or greater than the original prize.

Entrants acknowledge that their entries may be released or displayed to the public by DLG or any agency connected with the prize draw and assign all rights necessary for promotion or publication of such entries to DLG.

By participating in the survey and submitting your information, entrants are agreeing to receive marketing offers from surveys.co.uk and/or its sponsors/partners.

Entry into the draw will be deemed to constitute acceptance of these terms and conditions and entrants agree to be bound by these terms and conditions.

Any queries and comments should be directed to [client.services@dlg.co.uk](mailto:client.services@dlg.co.uk) or by writing to Data Locator Group Ltd, Sunningdale, The Belfry Business Park, 13 Colonial Way, Watford, Hertfordshire WD24 4WH.

All copyright remains the property of DLG.

The Prize Schedules for each of the Prize Draws are set out below:

Win £500 Prize Draw – each prize listed in this category is worth a combined total of £500 - the prize is either:

Win £500 in cash, or

Win 1 of 5 £100 Amazon vouchers, or

Win 1 of 10 £50 Starbucks vouchers, or

Win a PS4 plus Games Bundle worth £500, or

Win a year's supply of Cadbury's Chocolate worth £500, or

Win a year's supply of Walkers crisps worth £500, or

Win £500 to spend on Ryanair flights, or

Win 1 of 5 GoPro Cameras, or

Win a Spa weekend break worth £500, or

Win £500 to spend on MAC make-up, or

A cash prize of equivalent value will be offered as an alternative to any of the above prizes.



To enter by post please send your name, address and telephone number to:

Prize Draw Entry, Surveys.co.uk / ThePrizeFinder.com, Data Locator Group Ltd, Sunningdale, The Belfry Business Park, 13 Colonial Way, Watford, Hertfordshire WD24 4WH.

Please mark clearly which prize draw you wish to be entered into.