

# Privacy Policy

**Updated:** 20/04/2020

## Introduction

PMDSC are specialists in the provision of consumer data for marketing purposes and we are committed to protecting and respecting your privacy in accordance with the General Data Protection Regulation (“GDPR”), UK data protection laws and specific direct marketing codes of conduct (herein collectively referred to as the “GDPR”).

We work closely with some of the UK's leading brands to help them target their offers better and learn more about what consumers want from their products & services.

This Privacy Policy sets out the basis on which any personal data that we collect from you, or that you provide to us, will be used and processed by us.

PMDSC is registered as a Data Controller with the Information Commissioner's Office “ICO”, and as such your information will always be safeguarded through our adherence to the General Data Protection Regulation ((EU) 2016/679) (“GDPR”), the Data Protection Act 2018 and the Privacy and Electronic Communications Regulations (“PECR”) (2003) to ensure that the information that you provide to us is safe and is only used for the purposes that are stated in the opt-in statement provided at the time the information is collected and in accordance with this Privacy Policy.

For the purpose of the GDPR, the Data Controller is:

### **PMDSC Ltd**

Registered in England Company No. 08292470

Registered Office: 30 Station Lane, Hornchurch, Essex, RM12 6NJ

ICO Registration No: Z3509105

PMDSC (“PMDSC”, also stated in this document as “us” or “we”)

The Data Subject (“Data Subject” also stated in this document as “you” or the “individual”) is any person whose personal data is being collected, held or processed.

Although not a member of the Direct Marketing Association (“DMA”), PMDSC endeavour to abide by the DMA code of conduct in conjunction with the legal requirements of GDPR, DPA 2018 and PECR.

## Data Protection Principles

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using your personal information.

Please note that we may update this notice at any time. If relevant (and feasible), please ask to check that you have the latest current version of our privacy policy. Contact us - [enquiries@pmdsc.co.uk](mailto:enquiries@pmdsc.co.uk) or [compliance@pmdsc.co.uk](mailto:compliance@pmdsc.co.uk).

1. We will comply with all relevant data protection legislation. This requires that the personal information that we hold about you must be:
2. Used lawfully, fairly and in a transparent way.
3. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
4. Relevant to the purposes we have told you about and limited only to those purposes.
5. Accurate and kept up to date.
6. Kept only as long as necessary for the purposes we have told you about.
7. Kept securely.

## For the Individual or Data Subject

### The Data That We Collect About You

Personal data, or personal information, means any information about an individual from which that person can be identified, whether directly or indirectly. It does not include data where an individual cannot be identified (anonymous data).

We collect personal data from third party providers such as call centres and lead generation websites. We are not obliged to publish a list of these providers due to commercial and legal protection reasons. You can contact us on - [enquiries@pmdsc.co.uk](mailto:enquiries@pmdsc.co.uk) or [compliance@pmdsc.co.uk](mailto:compliance@pmdsc.co.uk) should you wish to enquire about an individual provider related to your specific enquiry.

## Personal Data Sample

An example of supply data received from a third party partner will generally be limited to:

- Unique Reference Number (URN) – System generated identification reference
- Salutation
- First Name
- Surname
- Gender
- Address (including postcode)
- Telephone Number
- Email Address (Online/web sources only)
- Date of Birth or Date Range (where provided)
- IP address of registration (Online/web sources only)
- Registration date and time stamp
- Data purchaser (company/s registered lead is supplied to)
- Supply date and time stamp

The information that you volunteer to PMDSC, via either call centre consumer surveys or lead generation programs, may be shared and used to appropriately target offers and marketing communications from our clients and from our selected third party partners. Marketing communications may be via telemarketing, email, post or SMS/MMS, depending upon the contact information that you provide to PMDSC and/or by the specification of a marketing channel preference.

By volunteering your telephone number via third parties, you are agreeing to telephone contact from our clients, our selected third party partners and any named sponsors of specific survey questions.

Some questions on the consumer surveys are specific to named sponsor organisations, and by expressing a specific positive interest in their brand or products you are also agreeing to contact from them.

## Consent and Legitimate Interest

PMDSC and our selected third party partners will use your data to provide you with information on products or services which we or they feel may be of interest to you, or where you have consented to be contacted for such purposes.

The chart below summarises the application of Consent or Legitimate Interest by the specific Marketing Communications Channel –

Marketing Communications Channel	Consent	Legitimate Interest
<b>Telephone</b>	Where your landline or mobile telephone number is registered on the Telephone Preference Service*	Where your landline or mobile telephone number is <b>not</b> registered on the Telephone Preference Service*
<b>Email</b>	Consent only	Not applicable
<b>SMS/MMS</b>	Consent only	Not applicable
<b>Postal</b>	Where your home mailing address is registered on the Mailing Preference Service**	Where your home mailing address is <b>not</b> registered on the Mailing Preference Service**

[www.tpsonline.org.uk](http://www.tpsonline.org.uk)\*

[www.mpsonline.org.uk](http://www.mpsonline.org.uk)\*\*

Your data may also be used for validation, enhancement, information verification, suppression, tracing and to the extent permitted by law, individual reference or look-up services, by PMDSC and third parties.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

## Why Do We Collect This Information

We collect this information as it provides the basis of business and allows us to provide the following services to our clients.

- **Targeting:** To make sure that you receive offers relevant to you. Our clients use your information and information on other individuals to decide how best to target you and by suitable communication channels, this means that you should receive offers which are more relevant to you.
- **Marketing:** Our business is providing personal data to our clients for their marketing campaigns. For example, if a relevant organisation wanted to inform you about their product or service. We may provide details on the basis of your demographics, geography and legitimate interests.

## How Will We Use This Information

We will only use your personal information in the ways the law allows. Most commonly, we will use your personal information in the following circumstances:

1. Where you have provided consent for the processing of your data in relation to an opt-in to a registration for marketing purposes. In this instance, we will share your data with the relevant client company or charity.
2. Where processing is necessary for the purposes of legitimate interests by us as data controller. If personal data is used in this instance, we will document our considerations in a Legitimate Interests Assessment ("LIA").
3. Where processing is required for the performance of a contract either party have entered
4. Where processing is necessary for compliance with a legal obligation

We are not obliged to publish a list of these clients or charities due to commercial and legal protection reasons. You can contact us on - [enquiries@pmdsc.co.uk](mailto:enquiries@pmdsc.co.uk) or [compliance@pmdsc.co.uk](mailto:compliance@pmdsc.co.uk) should you wish to enquire about an individual client or charity related to your specific enquiry.

## Who We May Share Your Data With

Types of sectors and companies:

Sector	Description and Examples
<b>Retail</b>	Automotive (manufacturers and dealerships)
	Fashion and Clothing
	Home furnishings
	Home improvement
	Online retail
	Property
	Telecoms Providers
	Utilities Providers
	<b>Finance</b>
	Mortgages
<b>Insurance</b>	Insurance - Home
	Insurance - Car
	Insurance - Travel
	Insurance - Pet
	Insurance - Personal
<b>Travel</b>	Holidays
	Hotel
	Travel booking
<b>Lifestyle</b>	Charities
	Food & Drinks
	Fitness and Sports
	Health & Well-being
	Lottery and Gaming
	Leisure
	Media & Publishing

## Where We Store Your Personal Data

The data that we collect from you is stored at a secure destination in the UK and is processed by our staff or staff working for one of our partner suppliers. All information that you provide to us is stored on secure servers.

By submitting your personal data, you agree to the storing, processing and transfer of the data in accordance with this privacy policy. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

## How Do We Transfer Your Personal Data

PMDSC utilise a secure data transfer system called Leadbyte.

<b>Supplier Company (Data Processor)</b>	<b>Leadbyte Ltd</b>
<b>Address</b>	41 Hope Street, Chester, Cheshire, CH4 8BU, England
<b>Website</b>	<a href="http://www.leadbyte.co.uk">www.leadbyte.co.uk</a>
<b>Contact</b>	01244 344 319

Leadbyte is the data management software system which is used by PMDSC and is responsible for the secure transfer of personal data from the source to the end user. No other parties have access to the data at any point in this transfer process.

Data can be transferred instantly using this secure system. This system is owned and maintained by Leadbyte although they do not retain copies of personal data transfers made by their system. Any data retained within the system is restricted to the PMDSC data hosting environment, to which Leadbyte have no access.

PMDSC have no access to your personal data at the point of transfer, however act as a broker in the supply of personal data from the source to the end user.

A copy of the data file delivered to the client is retained in the Leadbyte (data management software system), to which PMDSC have sole secure access to and for the purpose of source identification look ups when required. No other party has access to this area of the system (including Leadbyte themselves).

Personal data may also be retained in a suppression file. This is not retained for marketing purposes, but to ensure a record is retained of individuals who ask to be removed from our marketing databases.



PMDSC will retain a record of the transaction of the purchase and transfer the file containing your personal data for a period of up to 24 months following delivery of the file.

In the event of a complaint or SAR (Subject Access Request), PMDSC will also retain a limited data record on the Master Suppression File which is a listing of individuals who have opted out of further marketing communications and this is to help ensure that their preferences are respected on an on-going basis.

This data is limited to:

- Request Type (DNC – Do not Contact Flag, Complaint, Subject Access Request)
- Full name
- Telephone number
- Date of initial request
- Date supplied to client
- Client
- Supplier

This Master Suppression File is held within the secure PMDSC Leadbyte environment, to which other parties have no access.

This is unless you would like to exercise your full rights to erasure and your record will not be added to the Master Suppression File.

## **Discloser of Your Information**

We may disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- If all of PMDSC assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use and other agreements; or to protect the rights, property, or safety of PMDSC, our customers, or others.

## **Data Security**

We endeavour to ensure the security of all correspondence. Please be aware that we are unable to guarantee the security of any data that you send electronically to PMDSC and are unable to accept responsibility for any loss or damage experienced through any loss of confidentiality of your information.

## How Long Do We Keep Your Data

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, or reporting requirements. We may retain your personal data for a longer period in the event of a compliance request or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory or other requirements.

Details of our various retention periods are in our retention policy and are available upon request.

## Right of Transfer

Should PMDSC choose to sell or transfer business assets, it is possible that the information we hold may be transferred as part of the transaction. PMDSC may choose to retain a copy of the information post sale or transfer.

## Access to the Data That We Hold

The GDPR regulations give you the right to access information held about you.

It is important that the personal information that we hold about you is accurate and current.

You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes.

You can exercise your right to prevent such processing by checking/unchecking the relevant boxes for our website advertisements or by informing the agent conducting the telephone survey with you.

You reserve the right to: right to be informed, right of access, right to correction, right to erasure/to be forgotten, right to restrict processing, right to data portability/transfer, right to withdraw consent, right to complain, right to object and rights in relation to automated decision making and profiling.

## Your Rights:

- **Subject Access Request** – this enables you to receive a copy of the personal information that we hold about you. To action this request, you can contact us on - [enquiries@pmdsc.co.uk](mailto:enquiries@pmdsc.co.uk) or [compliance@pmdsc.co.uk](mailto:compliance@pmdsc.co.uk).

Your right of access can be exercised in accordance with the GDPR. In most cases, PMDSC would not charge for a request, however if we deem the request to be unfounded or excessive, we may charge a fee for administrative costs for complying with the request.

If we consider that a request is manifestly unfounded or excessive, we will -

- Request a "reasonable fee" to deal with the request; or
- Refuse to deal with the request

PMDSC can extend timelines for compliance with a request from the Data Subject, if we deem the request to be either excessive or unfounded.

In either case, we will explain and justify our decision to the Data Subject. If we have concluded that the personal data is accurate, we will make the Data Subject aware that we will not be amending the data.

We would require a suitable form of identification and under normal circumstances, we will supply this to you within one calendar month of the date that we receive suitable proof of ID. A typical form of id would be a photographic copy of a utility or mobile phone bill that contains the individual's full name and address details.

- **Request Correction** – this enables you to have any incomplete or inaccurate information that we hold about you corrected.
- **Request Erasure** – this enables you to delete or remove personal information when there is no suitable reason for us to continue processing it.
- **Object to Processing** – in certain circumstances, you have the right to request we suspend the processing of your data.
- **Request the Transfer** – you have the right to request the transfer of your personal data to a third party.
- **Right to Withdraw Consent** – where we rely on consent to process your data, you have the right to withdraw this at any time, without giving reason. To withdraw your consent, contact us on [enquiries@pmdsc.co.uk](mailto:enquiries@pmdsc.co.uk) or [compliance@pmdsc.co.uk](mailto:compliance@pmdsc.co.uk).
- **Right to Complain** – you have the right to complain at any time to the Information Commissioner's Office (ICO) regarding data protection issues.

## Right of Erasure

You can remove your information from PMDSC at any time.

Furthermore, you can request suppression of your details from the PMDSC database if you would prefer us not to use your information for any of the purposes described.

Types of requests:

Code	Request Type	Sample Request Description
<b>DNC</b>	<b>Do not Contact</b>	<p>“Take me off of your list”</p> <p>“Stop the calls”</p> <p>“Please unsubscribe me from any further calls or marketing”</p>
<b>RTE</b>	<b>Right to Erasure</b>	<p>“Please remove all of my details from your database”</p> <p>“Remove my details”</p>
<b>COM</b>	<b>Complaint (Telephone not on TPS)</b>	<p>“Complaint” in the email subject line</p> <p>“Where/How did you get my details?”</p>
<b>TPS</b>	<b>Complaint (Telephone on TPS)</b>	<p>As above but are registered to the <b>Telephone Preference Service (TPS)</b></p>
<b>SAR</b>	<b>Subject Access Request</b>	<p>“What details do you hold on me?”</p> <p>“Under the GDPR law, I ask you to remove all of my data off your system and confirm back to me all companies that you have provided my information to.”</p> <p>As stated in Subject Line or email request – “Subject Access Request under the GDPR”</p> <p>“Please provide me with:</p> <ul style="list-style-type: none"> <li>- A full record of the information that you hold on me</li> <li>- Where this information was obtained and dates and times of data collection</li> <li>- The names of the organisations with whom my data was shared and when it was shared with them.</li> </ul> <p>To enable this request my details are: X”</p>



## You can unsubscribe at any time by -

Sending an email to:

- [compliance@pmdsc.co.uk](mailto:compliance@pmdsc.co.uk), with the subject line “Unsubscribe”; or
- [enquiries@pmdsc.co.uk](mailto:enquiries@pmdsc.co.uk), with the subject line “Unsubscribe”; or
- by writing to: PMDSC Ltd 30 Station, Hornchurch, Essex, RM12 6NJ

You may need to further contact the named sponsor brands directly should you decide to opt-out of further communication from these brands that you have previously given specific permission to.

If you have any questions, comments or concerns arising from the website, the privacy policy or any other relevant terms and conditions, policies and notices or the way in which we are handling your personal information, please contact us - [enquiries@pmdsc.co.uk](mailto:enquiries@pmdsc.co.uk) or [compliance@pmdsc.co.uk](mailto:compliance@pmdsc.co.uk).

## Our Complaint Escalation Process

Where possible, PMDSC will attempt to resolve your request at the first point of contact. If we are unable to resolve your request at the first point of contact, we will undertake an investigation of your request and provide you with our findings.

If you are not satisfied with how your request has been managed or the resolution provided by PMDSC, you can request PMDSC to escalate your complaint to the Information Commissioner’s Office (ICO), for independent external review or you, the Data Subject, may contact the ICO directly for the same purposes.

## Useful Links

- The Information Commissioner - [www.ico.gov.uk](http://www.ico.gov.uk)
- The Direct Marketing Association - [www.dma.org.uk](http://www.dma.org.uk)
- Telephone Preference Service (TPS) - [www.tpsonline.org.uk](http://www.tpsonline.org.uk)

## For the Client or Third Party Partner

If you are a client or supplier, then we will need to process your data in line with our legal obligations. In some cases, we may use your personal information to pursue legitimate interests of our own or those of third parties, provided your interests and fundamental rights do not override those interests. The situations in which we will process your personal information are listed below.

- Administering the contract we have entered into with you and providing our products and services to you
- Business management and planning, including accounting and auditing.
- Making arrangements for the termination of our contracting relationship.
- Dealing with legal disputes involving you, or any disputes that may arise under the contract that we have with you or the way in which we provide our products and services to you.

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

### Cookie Notice

Please see our Cookie Policy on our website – [www.pmdsc.co.uk](http://www.pmdsc.co.uk) for details of how cookies are used.

*PM DSC reserves the right to change this Privacy Policy from time to time and without notice.*