



Privacy Policy

Who are we?

We are a direct marketing organisation called DM Data Ltd "DMD", registered in England and Wales under company registration number 15767717. Our registered office is Green Heys, Walford Road, Ross-On-Wye, Herefordshire, HR9 5DB and we are a subsidiary of DM Ltd.

We are registered with the Information Commissioners Office under registration number ZB719413.

We are a Data Controller and process personal data supplied to us by third-party data controllers, to help support our clients' marketing communication activities.

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 478066 where you can speak to the Compliance Department or email compliance@dmdata.co.uk with your questions.

What categories of personal data do we hold 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 or website registration, data controllers will 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.

We will never accept special category data from suppliers such as, medical history, religious or political beliefs and nor will we accept or process information such as your bank account or credit card details.

The data we hold and process is from reputable third parties. You will never be obliged to provide your personal data to them. If you do decide to complete a marketing survey, you will always have the right to remove your permission at a later date, see the 'What are your rights?' section for more detail.

DM Data Ltd, Sunningdale, The Belfry Business Park, 13 Colonial Way, Watford, Hertfordshire, WD24 4WH.

 www.dmdata.co.uk  hello@dmdata.co.uk  +44 (0)1923 478 066

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What do we use your data for?

The data that is supplied to us by our suppliers is for the following purposes:

Direct Marketing - Our suppliers share your data with us for direct marketing purposes by telephone and/or post where you have not registered your objection to marketing via the Telephone Preference Service "TPS" or Mailing Preference Service "MPS". We share your details with selected companies who want to contact you by telephone and post to offer you goods and services that they 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, DM Data Limited, Sunningdale, The Belfry Business Park, 13 Colonial Way, Watford, Hertfordshire, WD24 4WH;

By email to: compliance@dmdata.co.uk ; or online at www.dmdata.co.uk/consumer

By telephone on: 01923 478 066

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 - telephone	n/a	Legitimate Interest - where your number is not registered on the Telephone Preference Service.
Marketing – by post	n/a	Legitimate Interest - where you are not registered on the Mailing Preference Service.
ID Protection and Tracing	n/a	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

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 our clients make the communication more relevant
- To help our clients provide direct marketing communications which they think will be of interest to you
- To help our clients better understand how their customers interact with their services
- To help our clients determine the effectiveness of our and our clients 'their promotional campaigns
- To help our clients identify 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 process your personal information for the purposes of customer analysis, non-automated profiling and direct marketing, to help our clients with their 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 their 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 to validate data 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, DMD 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, DM Data Ltd, Sunningdale, The Belfry Business Park, 13 Colonial Way, Watford, Hertfordshire, WD24 4WH; or by email to: compliance@dmdata.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?

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

A. Our Group of Companies and Brands

DM Data Limited is a data aggregator that collects data from reputable suppliers who themselves have collected personal data compliantly from UK consumers. This data is then shared with clients for postal and telephone marketing campaigns, where consumers have not objected to marketing.

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, 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@pdvltd.com.

B. Groups of recipients within the specific industry sectors listed

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
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.

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. To understand more about the products or services they offer please click through to their websites using the links below.

Client	Description
Sky UK Limited	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. Visit website

D. Marketing Service Providers

Marketing Services 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 Marketing Services Providers, who will use it for a variety of direct marketing purposes but only in line with those purposes described in this policy. 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). 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 personal 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:

- WINR Data Pty Ltd. <https://www.winrdata.com/privacy-policy/>

E. Credit Reference 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 compliance@dmdata.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, Datatrak Limited 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 for further information.

G. Non-Commercial Organisations

We may share your data with academic and research organisations, who use data to help direct public services and policy. An organisation with whom we share your details for such non-marketing purposes is the Consumer Data Research Centre (CDRC) which is an academic collaboration between several Universities including Leeds, Liverpool, UCL and Oxford. For more information see the privacy notice here: <https://www.cdrc.ac.uk/privacy-notice-cdrc-acquired-data/>.

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 our suppliers 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 DMD'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 and the privacy notice of our suppliers. 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?

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 designed to protect your rights and freedoms under the Applicable Laws here in the United Kingdom.

How long will we keep your data for?

The DMD database is refreshed on a monthly basis to ensure that marketing preferences are up to date.

DMD will not retain data beyond the contractual licence period in place with each data provider. Each provider will inform DMD if data is to be removed under the terms of their own data retention policy.

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 update your preferences with us at any time.

Do we collect data from other sources?

We collect personal information from third party suppliers to whom you have shared your data. When we do so, we conduct appropriate check and ensure that they have a valid legal basis to share your information with us. These suppliers include organisations such as offers and competition website operators and online publishers.

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 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.

- 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.

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** - We do not rely consent for marketing;
- 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;

You can make contact with regard to any of your rights in the following ways;

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

By email to: compliance@dmdata.co.uk ; or

By telephone on: 01923 478066

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>.

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