

CONSUMERSKETCH PRIVACY POLICY

The purpose of this Privacy Policy is to explain in simple terms how we, ConsumerSketch, obtain information from you (as a Data Subject), how we process and store that information, how it is used by other parties to promote their business interests, how you can find out what information we hold about you, and what you can do to amend the information, and your right to make a formal complaint if you are not satisfied with the treatment you have received.

ConsumerSketch specialises in the provision of consumer data for marketing and market research purposes and we are committed to protecting and respecting your privacy. We work closely with many of the UK's leading brands to help them target their offers better and help them learn more about what consumers want from their products. Our surveys provide manufacturers, retailers and service providers with the key information they need to serve you better.

As a leading data marketing company, ConsumerSketch takes the issue of personal data and privacy extremely seriously. ConsumerSketch is registered as a Data Controller with the Information Commissioner's Office, and as such your data will always be safeguarded through our adherence to the Data Protection Act 1998, and the Privacy and Electronic Communications Regulations (2003), and the General Data Protection Regulations coming into force in 2018 to ensure that the information you provide to us is safe and only used for the purposes stated in our opt-in and opt-out statements and in this Privacy Policy, and to comply with our registration with the Office of the Information Commissioner. ConsumerSketch also complies with the best practice protocols of the Direct Marketing Association to properly ensure the correct use of data.

This Privacy Policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

WHO ARE "WE"

ConsumerSketch is the trading name of a database of information owned and controlled by Psychographics Ltd. For the purpose of the Data Protection Act 1998 (the "Act"), the Data Controller is Psychographics Ltd, Company No. 02797425 registered with the Office of the Information Commissioner with reference Z4771771. The office address of the company, and the point of contact is

The Data Controller / The Compliance Officer
Psychographics Ltd
3 Armley Court
Armley Road
Leeds, LS12 2LB
Email info@consumersketch.co.uk
Telephone 0113 2460610

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Psychographics Ltd is a company wholly owned by Cadogan Information Ltd, also at the above address. Consumerdata Ltd, a sister company of Psychographics Ltd and wholly owned by Cadogan Information Ltd also, carries out data processing for ConsumerSketch.

SOURCES OF INFORMATION & THE DATA WE GATHER

As a source of information and data, we carry out surveys using two methods.

The first and main method is conducting surveys in association with survey partners in the travel, holiday and leisure sectors. These are carried out by you as the data subject, self-completing hard copy (paper) surveys, as the time taken to complete is minimised; as approved by the ICO, when data subjects freely give contact channel information, an “opt-out” tick-box is also used as this is “tamper-proof” when documents are data captured and imaged.

As a secondary method, we also carry out online e-surveys, and in this instance an “opt-in” method of gaining consent is used.

CONSENT OF THE DATA SUBJECT

In accordance with GDPR EC Directive 95/46/EX, consent is defined as follows:

“Consent” of the data subject means any freely given, specific, informed and unambiguous indication of the data subject’s wishes by which he or she, by a statement or by clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

All surveys are carried out, giving you, the data subject the opportunity to opt-in or opt-out as the case may be at the time of survey completion.

You can withdraw your consent at any time by contacting us, as described later in “Your Rights and Deregistration”.

WHERE WE PROCESS DATA

Data entry and data processing are carried out in our offices in Leeds. At certain times of the year, data capture services are sub-contracted to fully compliant companies, based in India and the Far East. The work that they do is partitioned in such a way that they cannot deduce any personal data about a data subject (they only data capture attributes not able to be linked to a data subject). They may also capture in isolation names and addresses, but not able to be linked to attributes or contact channel information. We insist and contract with these

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overseas suppliers to process information in accordance with the legislation we have previously outlined.

Data processing of the captured data is carried out in our Leeds office. This data processing may include such work as checking and verifying against our clients' reservation systems, the Postcode Address File (PAF), the edited electoral roll and other sources from time-to-time to ensure the highest level of data accuracy.

All processing of orders for the use of data, and the usage relating to data subjects is also carried out and stored in our Leeds offices.

As such, the data that we collect from you may be transferred for processing to and stored at a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. However, our subcontractors will comply with EEC rules and regulations even if outside the EEA.

By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy. All information you provide to us is stored on secure servers.

WHERE WE STORE DATA

The principal place of data storage is at our Leeds offices. However, the backing-up of data is critical to our operations; this function may be carried out both on-site and off-site. In the latter instance, namely off-site back-up, we will use the secure facilities of a sub-contract supplier, and if those facilities are "cloud based", the physical location of such storage may be anywhere in the world.

As such, the data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. However, our subcontractors will comply with EEC rules and regulations even if outside the EEA

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THE USES OF DATA

The information that we gather from surveys completed by you will be processed and stored and used to selectively target offers and marketing communication from ourselves and our clients, and from our selected third party partners wanting to promote their businesses and brands. Marketing

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communication may be through email, postal mail, telephone marketing, SMS/MMS and social media, depending on which contact channel information you have volunteered. Some questions on our consumer surveys may be specific to named sponsors, and by expressing a positive interest in their brand or products you agree to direct contact by them, so if in the future you decide to opt-out of further communication from these brands, you should contact them directly. By responding to any question, consent is given to contact from our customers in the Industry Sectors referred to under the 'Industry Sectors' section below. We may collect and process data about you in the following ways:

Your data may be used for analytical purposes. Your data may also be used in conjunction with data we may have received from other sources in order to improve personalised and targeted communications, and we may share information with other companies for the same reason.

Your data may be shared and combined with other companies who hold your personal data, and we may use information from other sources to add to data we already hold. This information may help us to improve our ability to service your needs on a personalised basis, by helping us to learn more about you and your purchasing habits and allowing us to let you know about offers you might be interested in.

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

Please remember that you can de-register from Consumersketch at any time (see Deregistration below). Furthermore, you can request suppression of your details from our database if you would prefer us not to use your information for any of the above.

DATA SUBJECT ACCESS

Every data subject has the right of access to the personal information we hold about them, as outlined in Data Protection Act 1998 Part 11 S7: Right of Access To Personal Data.

To enable us to process a request from you as a data subject access, we require confirmation of your identity. This is a protective measure to ensure that your personal data held is only disclosed to you, and to achieve this we need two forms of identification.

1. Confirmation or proof of your address e.g. copy of a utility bill
2. Confirmation of your person e.g. copy of a passport or driving license.

To enable a request to be dealt with promptly and lawfully, we must also receive a signed request from you confirming your wish for the information to be disclosed. In addition, we are entitled to make a charge for arranging such access (the standard charge is £10).

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On receipt of the above, we arrange immediate processing of your request and provide you with the following data, as specified in S7(1 b,c) of the Act within the prescribed period of 40 days as defined in S7(1 0).

1. A description of the personal data that we hold
2. The purposes for which this data is being processed
3. The recipients or classes of recipients to whom this data is disclosed
4. Information available as to the source of this data

Items 2, 3 and 4 above are also outlined in this Privacy Policy.

YOUR RIGHTS AND DEREGISTRATION

You have the right to ask us not to process your personal data for marketing purposes. You can exercise your right to prevent such processing by contacting us at Consumersketch, 3 Armley Court, Armley Road, Leeds LS12 2LB as detailed previously.

Our site may contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

You can unsubscribe from email communications at any time by clicking on the “Unsubscribe” link at the foot of any email correspondence. Your details will be suppressed and we will send no further emails and your details will no longer be passed onto any third parties for the uses described in this Privacy Policy. Please allow 48 hours for this to become effective.

It may be that we have previously provided companies with information which they did not use until after your notification was received by us. We will make every endeavour to update them but, as it is outside our control, cannot guarantee that suppression will occur within 48 hours.

OUR POLICY ON SPAM

Email Communication. Where you as a data subject by opting-in or not opting-out have given permission for email contact from third parties, that communication and use is deemed compliant. On the occasion of every transmission by ourselves or a third party, each data subject is granted the option to unsubscribe from that sender.

SPAM is defined as the sending of Unsolicited Commercial Emails, Unsolicited Bulk Emails or Unsolicited Facsimiles (which is email or facsimile sent to recipients as an advertisement or otherwise) without first obtaining prior

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confirmed consent to receive these communications from the sender.

Consumersketch views SPAM as a serious violation of privacy and a misuse of the internet in general. If you receive an unsolicited email with the domain of Consumersketch.co.uk you can unsubscribe via the process set out in our Privacy Policy. Upon receipt of the email, we will do our utmost to track down the offender and take any actions necessary to stop SPAM messages.

THE DISCLOSURE OF INFORMATION

We may disclose your personal information to any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries. We may disclose your personal information to third parties in the following circumstances:

In the event that we sell any business or assets we may disclose your personal data to the prospective buyer of such business or 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 ConsumerSketch, our clients, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

OUR SURVEY PARTNERS

We and our associated companies work with surveys partners in the travel, tourism and leisure sectors gathering feedback to enable them to monitor and improve performance, and help them market and promote their products and services in the future. They seek to communicate with you, their data subjects also, in the most effective means, to achieve the best possible response.

Their use of the information generated from the surveys will be as set out in their own Privacy Policies, over which we have no responsibility. Please refer to their websites for the necessary information.

THE INDUSTRY SECTORS WE WORK WITH

The following sectors are the industry types you can expect your data to be supplied to, depending on the answers given by you and your stated interests.

Automotive (including both manufacturers and garages),
Charity, Education, Gaming, Leisure, Investments, Loans,
Credit Cards, Insurance (all types including motor, home,

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travel, health, life, etc.), Politics (although we do not hold information on individuals' voting habits), Health and Mobility (although we do not hold information on individuals' health which is deemed sensitive), Home Improvements and DIY, Personal Wills and Funeral Plans, Claims Management (for mis-sold PPI, Investments, Credit Card / Bank Charges, Mortgages and Pensions), Mail Order (especially retail), Market Research, Media and Communications, Retail, Telecoms, Toiletries and Cosmetics, Travel and Leisure, Utilities (gas, electricity, water, energy).

We also supply our data to these sectors through agencies and brokers; we ensure that these agencies and brokers are reputable firms. Specifically, we supply data to The **Read Group** and **Optical Express** for their campaigns.

USEFUL LINKS

We are always keen to promote the best interests of consumers and how their personal data is used. So if you would like to know more about how your information can be utilised, how you can restrict its use, who has access and a wide range of other aspects, we suggest you refer to the following:

The Information Commissioner. www.ico.gov.uk

The Direct Marketing Association. www.dma.org.uk

The Citizens Advice Bureau. www.adviceguide.org.uk

For any further information please write to:

Data Compliance
ConsumerSketch
3 Armley Court
Armley Road
Leeds
LS12 2LB

YOUR RIGHT TO MAKE A FORMAL COMPLAINT

In the unlikely event of your being dis-satisfied by our handling of your request, in the first instance please address the problem to our Data Compliance Officer. If the matter remains unresolved, you have the right to make a complaint to:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

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