

# Privacy Policy - Tele Prospects Ltd

Last updated May 2018, in accordance with the requirements of the General Data Protection Regulation (GDPR).

This is the Privacy Policy of Tele Prospects Ltd, a company registered in England and Wales (Registered Number 05091787) whose registered address is Swinford House, Albion Street, Brierley Hill, West Midlands, DY5 3EE.

Tele Prospects Ltd (t/a TPL Media) is committed to acting in compliance with the General Data Protection Regulation. Our ICO Registration number is Z9386334.

TPL Media is a marketing services company. We hold your personal data in our database and process it for direct marketing campaigns on behalf of our clients. We are committed to protecting your privacy and maintaining the security of any personal information received from you. We follow strict security procedures in the storage and disclosure of information, which you may have given us, to prevent unauthorised access in accordance with stringent requirements of the General Data Protection Regulation.

The purpose of this statement is to explain to you what personal information we collect and how we may use it.

## Our lawful basis for processing personal data

TPL Media is a marketing services company. The data we collect from you is for marketing purposes. We may supply your information to clients for marketing or relationship management purposes.

The main purposes to which your data is used is to allow our clients to provide you with information about goods and services which they think may be of interest to you and/or to maintain any existing relationship they may have with you. Such information may be provided by marketing communications or advertising which is tailored to your interests.

In accordance with the General Data Protection Regulation we can use personal information where the benefits of doing it are not outweighed by the interests or fundamental rights or freedoms of individuals.

Our lawful basis for processing personal data for direct marketing is known as Legitimate Interest. The benefits being pursued by our organisation are the running of a marketing services and data business.

## What data we may collect from you and how we will use your data

TPL Media conducts telephone and digital campaigns to collect information from you for marketing purposes. This helps us ensure that the goods and service offers which we and our clients wish to make to you are relevant and tailored to your responses and what we know about you.

The marketing communication may be through:

- Email marketing
- Live Telemarketing
- Online Digital / Social Media Advertising
- Postal /Mailing Marketing
- SMS/MMS Mobile Message Marketing

The information we collect includes your name and contact information. We will never ask you for your bank account details, nor do we collect sensitive information about your medical history, religious or political belief.

Those clients and partners who would wish to send you marketing communications or to advertise to you will fall into the following categories:

Sector	Description and examples
Retail	<ul style="list-style-type: none"> <li>• Online retail</li> <li>• General stores</li> <li>• Automotive (including sales, accessories, rentals or repairs)</li> <li>• Property</li> <li>• Home furnishings</li> <li>• Home improvement</li> <li>• Fashion and clothing</li> <li>• Telecoms and Utilities</li> <li>• Mail Order</li> </ul>
Finance	<ul style="list-style-type: none"> <li>• Pensions</li> <li>• Loans, credit cards and mortgages</li> <li>• Investments &amp; savings</li> <li>• Wills</li> <li>• Funeral Planning</li> </ul>
Insurance	<ul style="list-style-type: none"> <li>• Home</li> <li>• Car</li> <li>• Travel</li> <li>• Pet</li> <li>• Personal</li> <li>• Other insurances</li> </ul>
Travel	<ul style="list-style-type: none"> <li>• Holidays</li> <li>• Hotel</li> <li>• Airlines</li> <li>• Travel booking</li> </ul>
Lifestyle	<ul style="list-style-type: none"> <li>• Health &amp; Well-being (including mobility)</li> <li>• Fitness</li> <li>• Charities</li> <li>• Media &amp; publishing companies</li> <li>• Leisure</li> <li>• Gaming</li> <li>• Legal Services</li> <li>• Educational institutions</li> <li>• Market Research</li> </ul>

Your data may also be used in the way described below:

#### **Analysis and derivative data products**

Sometimes your data will be used for analysis purposes or to build data products. In these instances, the information is aggregated and wherever possible anonymised in line with the Information Commissioner's code of practice. Again, these products are of a marketing nature.

## Profiling

TPL Media may use your data to group consumers into profiles, who are more likely to have common habits and interests. Profiling is summarising consumer data which include lifestyles, preferences, demographics, and purchasing patterns. It offers additional insight into customers and to help our clients to identify and gain a deeper understanding of their target market, enabling relevant and tailored marketing. We do not use profiling or any of the data we hold to make automated decisions about you.

## Marketing Surveys

TPL Media works with call centres who conduct our telephone campaigns known as Lifestyle Research. These call centres are based in the UK and outside of Europe including India, Guyana and Philippines.

TPL Media's call centres work under our systems and Data Protection and IT Security Policies - access to update all personal data is done through our systems. No data is transferred out of our servers that are all hosted within the EU.

## Who we will share your data with

TPL Media shares your data with:

### Tele Prospects Ltd Group companies and brands

TPL Media, Consumer Savers Club, Lifestyle Research, Lifestyle Surveys, Britpoll,

Lifestyle Preference, Savers Club, Creative Saver, Connecting Consumer, Compare Today,

### Marketing Services Providers

We will share your data with the Marketing Services Providers, some of them are listed below, who 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 that is more relevant to you via direct mail or when you visit a website. To understand more please click through to the websites of the companies below:

[Experian Ltd](#)

[REaD Group](#)

[Lloyd James Media](#)

### Claims Management Services

TPL Media may share your data with organisations specialising in claims managements (Unenforceable Credit Agreements, Mis-Sold Financial Products including Payment Protection Insurance, Package Bank Accounts, investments, Mortgage and Pension; Unfair Credit Card or Bank Charges). We work only with organisation that are authorised by Claims Management Regulator,

Tele Prospects Ltd are regulated by the Claims Management Regulator in respect of regulated claims management activities, registration is recorded on the Claims Regulation website [www.gov.uk/moj/cmr](http://www.gov.uk/moj/cmr) under authorisation number CRM19305.

## Data retention and how we retain data

In accordance with the GDPR, personal data shall be kept for no longer than is necessary for the purposes for which it is being processed.

TPL Media's systems store personal data therefore all reasonable precautions shall be taken to ensure that appropriate confidentiality and control procedures are in place. We take the security of your data and the accessibility to our systems very seriously, with an emphasis on physical security, network and application security.

Transferring your data outside of the EU:

Please note that personal information may be transferred, accessed and stored globally as necessary for the uses and disclosures stated above in accordance with this policy. This will only be done with a contract that has been approved by the European Commission with the recipient of your personal information that provides a suitable level of high quality protection.

## Data Breach

TPL Media have a procedure in place if a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed.

We will assess the scope and impact of the breach. If, due to the nature of the breach that TPL Media is required to inform the ICO, we will do so within 72 hours of becoming aware of the essential facts of the breach.

Based on the assessment of the likely risks to individuals, we will notify the individuals and/or their connected organisations that a data breach has occurred where this may result in a significant risk to the rights and freedoms of individuals, or where we may be in breach of a contractual obligation. Any such notification to individuals will be carried out as soon as reasonably possible and will include information on the nature of the breach, the name and contact details of our Data Protection representative, the likely consequences of the breach, measures taken or proposed by TPL Media to address it, and recommendations for affected individuals to mitigate any potential adverse effects. Such individuals will also be provided advice on how to make a complaint to the ICO.

## Your right to withdraw

TPL Media respects your rights to your personal data. The GDPR provides the following rights for individuals:

- The right to be informed
- The right of access
- The right to rectification
- The right to erasure
- The right to restrict processing
- The right to data portability
- The right to object
- Rights in relation to automated decision making and profiling.

If you do not wish TPL Media to use your personal data for direct marketing of our goods and services, you have the right to withdraw your permission at any time and can unsubscribe using the link in any email you have received from us or you can notify us in writing either by email to [compliance@tplmedia.co.uk](mailto:compliance@tplmedia.co.uk) or in writing to:

Compliance Dept  
2nd Floor Mander House  
Mander Centre  
Wolverhampton  
WV1 3NH

## How we use cookies

We may collect information about your computer, including where available your IP address, operating system and browser type, for system administration and to analyse aggregate information. A cookie is a small file of letters and numbers that we put on your computer. These cookies allow us to distinguish you from other users of our websites, which helps us to provide you with a better experience when you browse our websites and allows us to improve our sites. The cookies we use are "analytical" cookies. They allow us to recognise and count the number of visitors and to see how visitors move around the sites when they are using them. This helps us to improve the way our websites work, for example by ensuring that users are finding what they are looking for easily. Our cookies are not used to collect personally identifiable information about you.

We list below the cookies we use on each of our websites and provide a brief explanation of what those cookies do. Most web browsers allow some control of most cookies through the browser settings. For more information on this, and more information about cookies in general, you may wish to visit [www.aboutcookies.org](http://www.aboutcookies.org). For information about how to delete cookies from your mobile 'phone you will need to refer to your handset manual. Please be aware that restricting cookies is likely to impact on your ability to use our websites effectively and may make areas of our websites inaccessible or inoperable. The cookies we use are as follows:

utma (Unique visitor cookie)

utmb (Session cookie)

utmz (Campaign cookie)

utmv (Visitor segmentation cookie)

utmx (Google website optimizer cookie)

## How you can obtain data we hold about you

You have the right to know what information we hold on our system about you at any given time. To obtain details of the information we hold as it relates specifically to you, you may contact TPL Media at the following address:

The Data Protection Officer, Compliance Dept.,

2nd Floor, Mander House, Mander Centre,

Wolverhampton, WV1 3NH or

[compliance@tplmedia.co.uk](mailto:compliance@tplmedia.co.uk) with the subject line: Information Request.

When contacting us to ascertain the information we hold about you, it would be helpful if you could provide us with details of your full name, address and contact details.

## How you can contact us

If you have any questions or comments about this Privacy Policy, wish to exercise your information rights in connection with the personal data you have shared with us or wish to complain, please contact us at:

The Data Protection Officer  
Compliance Dept  
2nd Floor Mander House  
Mander Centre  
Wolverhampton  
WV1 3NH

We hope to always deal with your enquiries promptly and courteously. However, if you think there is a problem with the way we are handling your data, you have the right to raise this with The Information Commissioners Office - <https://ico.org.uk/concerns/>

## Changes to the policy

TPL Media reserves the right to modify or update this Privacy Policy from time to time.

Last updated May 2018