

# Privacy Policy

Last updated: 14<sup>th</sup> November 2023

## Who are we?

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Transactis is the brand name of Transactis 2017 Limited ('Transactis'), whose registered office is Green Heys, Walford Road, Ross-On-Wye, Herefordshire, HR9 5DB. Transactis 2017 Limited is ultimately owned by DM Ltd, a direct marketing company established in 2000. We are registered with the Information Commissioners Office under registration number ZA268694.

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

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Transactis is a direct marketing co-operative formed in 2003 to support the marketing activities of leading UK mail order retailers ("Members"). The Members work in the following industry sectors: *clothing, collectables, food & wine, gardening, gadgets & entertainment, financial products, health & beauty, household goods, and home interiors*. The Personal Data Members collect from you is detailed within their Privacy Policy. Some of this Personal Data, including your name, postal address, email address, telephone number and your transactions with the Members is shared with Transactis for marketing purposes. The Members will never share with Transactis any financially sensitive information about you such as, credit card or bank details.

## What do we use your data for?

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Transactis share information, supplied by the Members, with other Members for marketing purposes. This helps them target prospective customers ensuring that existing customers benefit from the promotions offered by similar mail order retailers. You will only ever be contacted by other Members or prospective Members by post. Any marketing communication you receive will only be made in relation to goods and services, within the industry sectors identified above, that we believe you may be interested in, based upon your purchasing preferences with Members.

## Legitimate Interests

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When we process your data we must have a legal reason to do so. The legal basis we rely on is; legitimate interests – which means based on the interests of our business balanced with your rights and ensuring your data is accurate, relevant and any marketing information sent to you is appropriate. Whilst our legitimate interest is a legal basis for processing your data you may object to our processing of your data in part or entirely by following the instructions provided in the section marked **Action I can take**.

## Cookies

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Transactis does not collect cookies. Members may collect cookies with your consent, but they do not share these with Transactis.

## What else we will do with your information

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We will also share your information with organisations who assist with the verification or validation of the identity of individuals for the prevention of money laundering, national security, crime prevention and detection, anti-fraud processes, the tracing of individuals, asset recovery and asset re-unification. You have the right to object to this processing at any time by contacting us at [compliance@transactis.co.uk](mailto:compliance@transactis.co.uk). The companies with whom we might share your information for these purposes are GB Group Plc.

## Where will we keep your information?

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Your information will be stored in the UK on our secure servers and unless we pass it to a third party service provider at your request, it will not leave the UK. Transactis takes security extremely seriously and stores your information on the servers of associated company, Data Locator Group Ltd (DLG). DLG are registered with the Information Commissioner and hold the Cyber Essentials and DataSeal accreditations, recognised standards for information security management for data-driven marketers. DataSeal is one of only two recognised security standards, along with ISO 27001, in the UK.

## What is Profiling?

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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 match with your members' 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 Transactis' database and you are a customer of one of our members, or prospective members.

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 use some of the information you have provided to identify lookalikes so our Members 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 or our Members 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 information with may also use profiling to target you for marketing purposes.

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.

Once again you can ask us to stop using your data in this way at any time.

## How long do we keep your data?

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We take your data privacy rights seriously. Whilst the law does not put a time limit on the amount of time we should hold your personal data, Transactis only wishes to retain data for as long as it is required for the purposes for which it was collected; for as long as it remains accurate and up-to-date; and most importantly, for as long as you are happy for our members to share it with us.

We do not want to keep your data for longer than is necessary and will regularly review if you are an active customer of one or more of the Members to determine if it is appropriate to continue to hold your personal information. You can of course ask us to stop processing your personal information at any time of your choosing using the methods described below in **Action I can take**.

Members provide data every month to update the information we hold; this is done to ensure that the most recent marketing preferences of the data subject are always adhered to.

## Do we collect data from other sources?

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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.
- Mailing Preference Service (MPS). Managed by the Data and Marketing Association (UK) Ltd, is central registers of individual's who do not wish to receive unsolicited marketing direct mail. You can register for these free of charge at <https://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 Wilmington Millennium Ltd. It is data management solution and enables organisations to identify deceased records using verified notifications of death.

From time to time, we will also use third parties to supply data subjects' personal information to us for marketing purposes.

- Other data controllers - where you have completed a marketing survey either online or by telephone and a Data Locator Group Ltd brand is named in their privacy policy as a company with whom they share information. Or where you have registered with a MyOffers 2019 Ltd brand online. Both MyOffers 2019 Ltd and Data Locator Group Limited rely on legitimate interest for this processing.

- Acorn, provided by CACI, is a consumer classification that segments UK households, postcodes and neighbourhoods into 6 categories, 18 groups and 62 types. Acorn is a postcode level tool rather than an individual level database. 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.

## What are your rights?

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You have certain rights under Privacy and Data Protection Regulations the most notable of which are;

- 1. Right to be informed** - In short when we collect your data we have to tell you what we are going to do with it primarily through this Privacy Policy.
- 2. Right of access** - You have the right to contact us to request details of the information we hold about you.
- 3. Right of rectification** - You have the right to ask us to rectify information that we hold about you if it is inaccurate or incomplete.
- 4. 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 do not receive further marketing from our members 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.
- 5. 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.
- 6. 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.
- 7. Right to object** - you have the right to object to processing based on legitimate interests or the performance of a task in the public interest, direct marketing and profiling.
- 8. 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.

**9. 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 you need to do so, at the time we collect your data and each time we contact you.

**10. Right to lodge a complaint with a supervisory authority** – See the section **Action I can take** below;

## Action I can take

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You can request what information we hold about you, why we hold it and who we have disclosed it to. The General Data Protection Regulation (GDPR) gives individuals the right to require us to do this.

A Subject Access Request or SAR is simply a request made by or on behalf of an individual for information which he or she is entitled to ask for. The request does not need to be in any particular format or include the words “subject access” or make reference to the GDPR. Some may make reference to other legislation such as the Freedom of Information Act or no legislation whatsoever.

A request made via social media is also a valid request however we will ask for a different delivery method for the response as social media would not satisfy information security consideration and make it inappropriate to deliver the information this way.

There is no charge for dealing with these requests under GDPR.

Requests made on behalf of others can be valid however we would need to satisfy ourselves that the third party is entitled to act on behalf of the individual. It is the third parties responsibility to provide evidence of this entitlement. This might be written authority or a more general power of attorney. If we believe that the individual may not fully understand what information would be disclosed to a third party who has made a SAR on their behalf the company may choose to send the response directly to the subject.

When receiving a request for a child the company must decide whether the child is mature enough to understand their rights. If so the response should be sent directly to the minor.

Individuals are entitled to:

- Know whether any personal data is being processed
- A description of the personal data, the reason it is being processed, and whether it will be given to any other organizations or people;
- A copy of the personal data
- Details of the source of the data (where this is available).

We endeavour to respond to a SAR promptly and in any event within 28 calendar days from receipt of the request where all necessary information has been received such as authority where applicable.

If any information is needed, the individual making the request must be informed as soon as reasonably possible and whilst we do not need to respond to the SAR whilst waiting for this information the SAR cannot simply be ignored or this reason used to extend the 28 days. This deadline can be extended by a further two months where there are a number of requests or the request is complex but in any event we will contact the individual within a month of receipt, explaining why an extension may be necessary.

If you wish to make a complaint you may do so by:

- Writing to: Data Protection Manager, Transactis 2017 Ltd, Sunningdale, The Belfry Business, Park, 13 Colonial Way, Watford, Hertfordshire, WD24 4WH;
- Email to: [compliance@transactis.co.uk](mailto:compliance@transactis.co.uk);
- Telephone on: 01923 281700 Monday to Friday 9.00 to 5.30;

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>

Wycliffe House; Water Lane; Wilmslow; Cheshire; SK9 5AF

Tel: 0303 123 1113

The Advertising Standards Authority. <https://www.asa.org.uk/make-a-complaint.html>

Mid City Place, 71 High Holborn, London, WC1V 6QT