

Privacy Policy

Last updated: 12th May 2022

Who are we?

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.

What do we use your data for?

Transactis is a direct marketing co-operative formed in 2003 to support the marketing activities of leading UK mail order retailers ('Members'). Transactis helps them acquire new customers and ensure their existing customers benefit from the promotions offered by similar UK mail order retailers. This includes using your data for postal marketing for Members who offer similar services. Any marketing communication you receive will only be made in relation to goods or services that we believe may be of interest to you based upon your purchasing preferences with the Members.

What types of data do we collect and share?

Members collect different types of information from their customers when they make purchases from them. The information the Members collect is detailed within their Privacy Policy. Some of this information is then shared with Transactis for marketing purposes; your name, your postal address, your email address, your telephone number and your transactions with the Member. The Members will never share with Transactis any financially sensitive information about you, such as credit card or bank details. Transactis will then share this data with other Members to help them target prospective customers. You will only ever be contacted by other Members or prospective Members by post.

Legitimate Interests

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**.

Transactis 2017 Limited

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

T: +44(0)1923 281 700

Registered in England :10850674 | Registered Address: Green Heys, Walford Road, Ross On Wye, Herefordshire, HR9 5DB.

Cookies

Transactis does not collect cookies. Members may collect cookies with your consent, but they do not share these with Transactis. We do share information, under strict licence terms, with other marketing services providers who will use alongside the cookies that they or their partners may have already collected from you with your consent. This enables web and mobile app publishers to serve relevant adverts to you from our Members, or other similar direct marketing organisations, on devices that you use such as a PC, a tablet or a mobile phone. The marketing services providers that we share your information with are;

Live Ramp (an Acxiom company) - <http://liveramp.uk/cookies-101/>

Oracle - <https://www.oracle.com/uk/legal/privacy/marketing-cloud-data-cloud-privacy-policy.html>

What else we will do with your information

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 consumerdataprotection@dlg.co.uk. The companies with whom we might share your information for these purposes are GB Group Plc.

Where will we keep your information?

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?

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

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How long do we keep your data?

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**.

What are your rights?

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 in writing 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

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 a 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;
- 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