

GDPR Data Compliance & Transparency Policy (Adopted March 2018)

For the purposes of this document Newscast Media Group Ltd refers to the marketing databases we hold and the marketing business we provide for our clients.

The Privacy and Electronic Communications Regulations (PECR) which work alongside the GDPR and govern marketing activity using electronic means such as email, phone and text apply to our clients who use the data we provide to them for marketing purposes by electronic means. Under PECR, email marketing to non-limited businesses requires consent which under the GDPR needs to be specific to the organisation that will send the email. Our suppliers are unable to gather this consent and so for this reason, at this time, we will not be supplying email addresses on non-limited businesses.

However, we provide emails for contacts within corporate/registered businesses on the basis they are only used for marketing of B2B products and services and the DMA Code is followed which includes providing a clear unsubscribe option and then screening future campaigns against the unsubscribe list. A new ePrivacy Regulation is being worked on which will replace PECR and we will keep this area under review.

Below we have outlined the sources of our data:

Data Category	Source	Type of data
Government	Companies House	This is the government database of business registrations and filing updates, which includes all registered business –Limited companies, Public Limited Companies and limited liability partnerships. Included within this information are the details of a business's Directors, Shareholders, Secretaries and other Persons of Significant Control.
	Open Government Licence (OGL)	This includes various datasets released by the government under the terms of the Open Government Licence for example, Food Standards Agency, Council data, Vehicle & Operator Data.
Publicly available websites	Businesses' own published websites	Additional information published by a business such as opening hours, ecommerce data such as shopping basket facility and payment facilities. Also used to validate data from other sources.
Publicly published directories	Private companies who publish business directories online	Basic business details (name, address, multiple contacts) collected and verified by phone or online.
Specialist contact directories	Private companies who collect specific data on specific businesses or types of organisations	Basic business details (name, address, multiple contacts) collected and verified by a range of methods (generally by phone) on specific sectors e.g. IT, Fleet, public sector, retail.

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Marketing – helping our clients contact the businesses that may be interested in their products/services

We supply the data we collect to our clients to help them market their relevant business to business (B2B) products and services to other businesses who may be interested in them. Typically, the data used is the name, address and contact details of organisations. This helps our clients with their direct marketing whether via mail or phone or email marketing campaigns.

Additionally, we provide clients information about the business themselves such as industry, size, etc. This is delivered together with the results of models we have created for clients for them to help make more informed decisions about whom to contact and how to contact them for marketing purposes.

Our clients are providers of business to business products and services and we do not authorise our B2B data to be used to market consumer products. We do allow marketing research companies to use this data for genuine market research as long as they are members of the Marketing Research Society (MRS) and follow the MRS Code of Conduct.

An important part of our business is ensuring that the data we sell is targeted as much as possible. This is in the interests of the client who wants value for money, through high success rates of their campaign and to reduce waste of time and resource spent sending unwanted marketing materials. It is also in the interests of the businesses receiving such marketing communications who only want to receive relevant communications about B2B products and services they might be interested in. This is achieved in various ways from simple self-selection using basic criteria such as geographic area, size of business and line of business.

Legitimate interests

The UK's data protection law allows the use of personal data where its purpose is legitimate and isn't outweighed by the interests, fundamental rights or freedoms of data subjects.

The law calls this the Legitimate Interests condition for personal data processing.

The Legitimate Interests being pursued here are:

Interest	Explanation
Newscast Media Group Ltd. has a legitimate interest in running a successful data business which generates revenue by helping businesses both promote and be informed about relevant B2B products and services through highly targeted direct marketing campaigns	Newscast Media Group Ltd provide prioritised, appropriate, accurate business contact data to client businesses wishing to promote business relevant services and products through targeted direct marketing campaigns. This allows businesses to economically promote their products beyond their existing customer base, providing a viable route to market for new and existing businesses and their products.
Allowing B2B service providers to better understand their customers	By matching a client's customer account data both to itself and to external business reference data Newscast Media Group Ltd can provide a client with a complete view of its relationship with a business customer. This business customer can also be enhanced with business attribute data to allow the client to ensure each customer receives the most appropriate service offers.

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Newscast Media Group Ltd. use of this personal data is subject to an extensive framework of safeguards that help make sure that people's rights are protected. As well as ensuring any data used for marketing by clients is accurate, appropriate and fitting with the needs of the data subject and the client, safeguards include the information given to people about how their personal data will be used at collection and providing means for individuals to exercise their rights to obtain their personal data, have it corrected or restricted and object to it being processed. These safeguards help sustain a fair and appropriate balance between our activities and the interests, fundamental rights and freedoms of data subjects.

Our aim is to ensure that businesses receive communications about B2B products and services that they are likely to be interested in and that suppliers who can deliver those products and services are better placed to communicate with those individuals within those businesses. We believe this is very much in the interests of the individual business person as there are many indirect benefits of this processing:

- Increased competition resulting in lower prices and convenience
- Innovation is fuelled which drives new product development
- Efficiency and cost savings realised
- Better customer experiences created
- Enables individuals to find better, more efficient ways to do their jobs, which can further their careers and economic prosperity.

This section describes the types of recipient Newscast Media Group Ltd. shares data with. There are strict access control processes in place. For example, before we share data with any another organisation, we do due diligence appropriate for the organisation type and always ensure protections and data security terms are included in our contracts with these organisations.

Clients

Newscast Media Group Ltd provides business contact and analytical data to businesses wishing to provide B2B products and services. Various checks are completed on new clients to ensure they will use the data for B2B purposes only and this is enforced through contractual terms.

Resellers, distributors and agents

Newscast Media Group Ltd sometimes uses other organisations to help provide its services to clients and may provide personal data to them in connection with that purpose only.

Various checks are completed on new resellers, distributors and agents to ensure they will use the data for agreed purposes only and this is enforced through contractual terms.

Processors

Newscast Media Group Ltd may use other organisations to perform tasks on our behalf (for example; data validation).

Newscast Media Group Ltd is committed to deliver excellent customer service levels but if you're not happy you should contact us so we can investigate your concerns.

Our Contact Details

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