

Due Diligence Q&A's

Q: How do you measure last known successful engagement? I.e. Data subject opened an email, or completed a transaction etc.

A: Mailed and delivered, emailed and delivered or called and answered, or where a transaction/registration has been completed.

Q: What is your complaints resolution process?

A: Our subject access request procedure is handled in house by our compliance team who aim to respond to all requests within 24 hours.

Q: Do you have an auditable suppression list in operation for any data subject wishing to opt out of your database(s)?

A: Yes.

Q: Which channels does your consent wording allow for? I.e. Texts, emails, automated calls etc. Please list all which apply and describe any differences between marketing/non-marketing contacts:

A: Postal, email, mobile and landline telephone.

Q: Do you offer the data subject the option to be contacted to via different channels? Please provide additional comments below:

A: Data subjects consent to being contacted by post, landline, email, mobile and SMS (DBS' data policy does however not permit SMS activity).

Q: Do you keep a record of the date of consent, method of consent, who obtained consent and exactly what information was provided to the data subject? If NO or SOME, please explain why:

A: Source, permissioned consent statement/s and date of consent are held by our contributors.

Q: How do you ensure that the purpose of the data collection is clear to the data subject?

A: Consent statements, privacy notices and terms & conditions clearly state the categories of offers and the channels through which data subjects can expect to receive them and that those offers may be from third parties.

Q: What measures do you have in place to ensure that data obtained from a third party has been properly sourced, permissioned and cleaned? I.e. Contracts, due diligence, privacy policies etc.

A: DBS' annual and new client due diligence includes data audits, sample testing and analysis, recency and consent testing.

Q: Do you offer the data subject a choice of sectors when obtaining consent? I.e. Gardening, charities, shopping etc.

A: Yes, product, service, sector or category varies between consent statements with the most recent being most explicit.

Q: Do you provide the data subject with the opportunity to express additional contact preferences? I.e. do not call after 7pm.

A: No

Q: Please provide details regarding permissions for the transfer of personal data outside of UK Borders

A: Must remain within the European Economic Area (EEA) or with the USA under particular circumstances.

Q: Please provide a list of the information available for complaints handling and Subject Access Requests (SARs)

A:
Contributor contact details/Source of data
Full details held by DBS/provided by contributor
Initial supply date
Dates of engagement
Who DBS has shared their details with
Regulation references
DBS ethical policy
Industry suppression lists
Peer suppression details

Q: Do you comply with all legislation when processing personal data, including the DPA and PECR?

A: Yes.

Q: We do not send or instigate the sending of one-to-one commercial communications to any data subject using data obtained in breach of data protection and/or privacy legislation

Y: Agree

Q: Do you have an internal complaints and/or data enquiry policy?

A: Yes

Q: How do you keep your data up to date and accurate?

A: monthly supplier refresh files, monthly and weekly supplier suppression feeds, EER and multi-source contact point verification, goneaway, deadline, bounced and invalid email, HLR failed mobile suppressions, five month consent refresh cycle.

Q: Would we be able to provide within 10 working days, evidence of an individual's consent to third party marketing for any of the data records you supply?

A: Yes, directly to the data subject, normally within 2 business days.

Q: How is the permissioned data captured?

A: Online and offline transactional, survey, public domain and registration data.

Q: Have you got a robust contract in place with each supplier?

A: Yes.

Q: Have you carried out data protection due diligence on each supplier to ensure the data they supply has the necessary permissions for third parties to market to those individuals?

A: Yes.

Q: Is any of your data sourced by telephone call centres operating outside of the following locations?

A:

UK – No

European Economic Area (Excl UK) – No