

Terms and Conditions

Lead Intelligence Limited are a UK consumer data aggregate. This means that we gather information about people from different data sources called Data Contributors. The data includes loan applications, competitions entries, newsletter subscriptions and public databases such as the Edited Electoral Roll, the Land Registry and the Energy Performance database. We combine this information to create a Single Customer view so we can provide your information to other companies who want to contact you about their products and services. These other companies are called Third Party Controllers and we share your information with them.

Our Data Collection Practices

Lead Intelligence Ltd is a leader in the marketing services industry, so we adopt and implement best practices and diligently seek to follow all laws governing the acquisition, compilation and distribution of consumer data. These practices include careful screening of data sources, ongoing internal audits, and appropriate consumer notice and choice.

Consent and Legitimate Interests Your data must be processed by us using one of the valid legal bases set out in the regulations. The two we utilise are Consent, this is where you consent for contact by a specific organisation by communication channels agreed by you, for specific reasons, which in the context of our processing will be for marketing purposes. When we ask for your consent for a specific organisation, we will do so by giving you the opportunity to tick a box online or answer a question on the phone. You can of course withdraw your consent at any time, and we will describe later in this policy Legitimate interest As a direct marketing business, we process personal data for commercial benefit. We require an appropriate legal basis to do this. In considering the most appropriate legal basis, Lead Intelligence conducted Legitimate Interest Assessments. These are evaluations of each type of data processing activity to ensure we have balanced the need for processing against the rights of the individual to ensure minimal privacy impact. Your data will be processed in pursuance of legitimate interests, this includes using your data for postal and telephone by ourselves or partners in relation to products or services we believe will be of interest to you based on the information you have provided. For all types of processing activities, we apply various measures to protect your privacy rights. As with all data processing you can object as detailed below.

Why do we process your information?

We process your information to share with Third Party Data Controllers to bring you information about Products and Services that may be of interest to you and include such things that may help you save money, borrow money, reduce debt, increase earnings, improve your credit rating, improve your health and fitness, create more value for money, get better results and create benefits for you and your family.

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 for. Lead Intelligence '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.

Why do we share your information with Third Party Controllers?

We only share your information if you have given explicit consent. This means that you have made a positive action to opt-in and agree to Third Party Controllers contacting you directly or passing on your information to a Sub Processor to contact you. A Sub Processor may be a Call Centre who are employed by a Telecoms or Utility company to inform you about Products and Services that may be of benefit to you, for example. When you have registered, applied or made an entry on a Data Contributor's website or app you will have been given the option to agree to third party marketing by the channel/s that you specified. Typically, you will have four options to choose from which are Telephone, SMS (Text Message), Email or Post. You can select one or all options depending on your preferences. Your ability to process a loan application, enter a competition draw or subscribe to a newsletter is not affected if you choose to decline and opt-out of sharing your information with Third Party Controllers. Please find a list of Products and Services provided or promoted by Third Party Controllers and Sub Processors below

How do we process your information?

Your information is processed to:

- Supply to your data to Third Party Controllers
- Ensure accuracy by combining data and insights from multiple Data Contributors
- Restrict marketing communications for consumers registered with MPS or TPS
- Update the data using GB group Disconnect product to identify people who have moved home or are deceased
- Remove your data from our database and Third-Party Controller databases
- Respond to your requests for information
- Update and correct the accuracy of the data

- Combine data from multiple Data Contributors and publicly available databases to make assumptions using combined data to create marketing profiles.

- Provide you with marketing information about products and services that are listed in the Privacy notice on Data Contributor's websites.

- Create marketing profiles using information provided in your application i.e. Loan Purpose, Marital Status or Employment Industry, for example.
- To maintain a suppression file of data that has withdrawn consent for Third Party Controllers
- Enrich your information by appending information available from Government 'Open' data e.g. Land Registry (<http://www.gov.uk/government/organisations/land-registry/about>) or the EPC Register (<http://www.epcregister.com/>) to create marketing profile

- Create marketing categories derived from information you have provided including Demographics – age, gender, marital status, number of children, occupation Behavioural and lifestyle – hobbies, sporting activities, travel preferences, high-tech equipment users and purchasing behaviour, Property Information – property

type, property value and tenure and Life events – consumers who have recently moved home or had a baby, Transnational – expenditure, income, Automotive – Make and Model of Vehicle

· Derive information pertaining to individual customers such as Gender, Marital status, Actual and estimated age range, Estimated income, Education level, Household status (head of household, spouse, elderly parent, young adult), Lifestyle interests (e.g. product ownership, interests and hobbies, travel, charities supported etc)

· Derive information pertaining to Households such as Property type, whether a household rents or owns a home, The estimated value of a home, Length of residence, Number of adults, Telephone number, Presence of children, Estimated Household income

· To create Custom Audiences on Facebook and Google Platforms.

Third party controllers may contact you by email, SMS, telephone or post depending on the level of consent you have given.

What “Your Rights” are Your Individual Rights in respect of personal data that we hold as a controller are:

A: Right to access – You have the right to request details of the personal data we have about you.

C: Right to Rectification – You have the right to ask us to rectify the information held on you if it’s inaccurate or incorrect.

D: Right to erasure – This is also known as “the right to be forgotten”. This gives you the right, in certain circumstances, to request your information to be removed/erased.

E: Right to Restrict processing – You have the right, in certain circumstances, to tell us to stop processing your data but allowing us to keep enough information about you to ensure that your wishes are repeated in the future.

F: Right to portable data – This gives you the right, in certain circumstances, to ask for your information to be transferred to another business.

G: Right to Object – You can object to us processing your personal data on grounds relating to your particular situation, but only as far as our legal basis for the processing is that it is necessary for: the performance of a task carried out in the public interest, or in the exercise of any official authority vested in us; or the purposes of our legitimate interests or those of a third party. If you make an objection, we will stop processing your personal information unless we are able to: demonstrate compelling legitimate grounds for the processing, and that these legitimate grounds override your interests, rights and freedoms; or the processing is in relation to a legal claim.

H: Rights related to automated decision making including profiling – To the extent that the legal basis we are relying on for processing your personal data is consent, and where the processing is automated, you are entitled to receive your personal data from us in a structured, commonly used and machine-readable format. However, you may not have this right if it would adversely affect the rights and freedoms of others.

I: Right to withdraw consent at any time – You have the right to withdraw your consent to us sending marketing communications to you at any time.

J: Right to lodge a complaint – If we cannot deal with your complaint to your satisfaction you have the right to complain to a relevant supervisory authority; The Information Commissioners Office – <https://ico.org.uk/concerns/>

How do you withdraw your consent for marketing?

Withdrawing consent is simple. You can email compliance@LeadIntelligence.co.uk with your request to withdraw your consent.

Please include your First Name, Surname, [Mobile, Landline or Email] and Postcode so we can identify you and remove your information from the database.

It can take up to 28 days to remove your information from all Third-Party Controllers.

If you continue to receive marketing message after 28 days after your request to withdraw your consent, please contact us directly. Alternatively, you can call us on 07968478916.

Our office opening hours are Monday to Friday between 9:00am and 5:00pm. Please be aware that a Subject Access Request can only be accepted in writing and we cannot give out personal information over the telephone without first taking the required steps to satisfy our obligations to GDPR, the ICO and the Data Protection Act.

You may withdraw your consent at any time.

More useful information to manage your marketing preferences below:

Postal Marketing – You can opt out of postal marketing by registering with the Mail Preference Service (MPS) This is an industry wide service that is administered by the Direct Marketing Association and recognised by the Information Commissioner.

Telephone Marketing – You can opt out of all telemarketing activity by registering their details with the Telephone Preference Service (TPS) The TPS is similar to the MPS but is administered by the Information Commissioner

Email Marketing – Unlike Postal or Telephone channels, there is no industry-wide service to opt out of email marketing. Therefore, consumers should always review privacy policies and marketing opt-in check boxes when registering for services or purchasing products online. Where unwanted email marketing is received, consumers should unsubscribe or use spam filters to prevent future communications.

Online Advertising – Marketing data is widely used to inform the advertising that is displayed when browsing online. Whilst digital marketers generally do not know the identity of the individual viewing a page, they are able to understand their likely characteristics based on their browsing behaviour or location in order to display a more relevant advert. If you would prefer not to receive targeted advertising in this way, there are a number of options available:

Cookies– are small files used by websites to recognise returning visitors and tailor content or advertising more effectively. Declining cookies when visiting websites will prevent those sites from displaying targeted advertising, whilst all modern browsers have a setting to clear cookies, which will delete all cookie data stored from previous website visits. More information about the use of cookies for online advertising, together with further opt-out options can be found at [Mobile device cookies used for advertising do not generally work on mobile devices](#), however, advertisers can still recognise returning visitors both when browsing online and when using apps through the use of an 'Advertising ID'. The Advertising ID is created by the mobile device, but

can be reset at any time, thereby deleting all data held against it. Instructions on resetting Advertising ID's will vary by device but can be found here for Apple devices, or here for Android devices.

What information do we aggregate?

Categories of Data Types of Data Contact Information First Name, Surname, Postcode, House Name, Street, Town/City, Country, Home Phone, Mobile Phone, Employer Phone Number, Email Demographic Gender, Marital status, Number Of Dependents, Residential Status Digital Address, Device Type Employment Employer name, Employment industry, Job Title, Length of employment – Years and months Financial Loan amount, Loan purpose, Length of loan, Monthly income, How are you paid, How often are you paid, Next pay date, Rental/mortgage payments, Other expenses, Utilities/Bills, Transport, Food, Other income, Lender Decision Pension Do you have a pension, Pension income Property Homeowner status, Time at Address – Years and Months In addition to the Data Fields that you may input during an application, entry or submission we may also combine data from the publicly available databases listed below at an Individual level, relating to you, or a household level, relating to your household.

Publicly Available Databases

The Land Registry www.gov.uk/government/organisations/land-registry The EPC Register www.epcregister.com Electoral Roll www.gov.uk/electoral-register

Combining data

The information you give us may be combined with other information about you that is obtained from other sources. The combination is usually undertaken with a view to enhancing an existing database with more information. For example: If you are already a customer of a third party, that third party might wish to add an e-mail address you give us to the customer records that it holds about you, and use that email address to maintain their relationship with you and/or to offer you goods and services that are similar to those you have previously purchased. The information you give us may be compared with data available elsewhere to verify your identity or validate the information you have provided (for example in the context of anti-fraud measures).

Anonymity information about you may be combined with information about your devices (or cookies deployed on your devices) to improve the relevance of advertising material on websites you visit. We may also use data acquired from Facebook that has been collected from websites and applications that allow you to connect with them using your Facebook profile. You can manage your privacy settings on Facebook here www.facebook.com/about/privacy

Who do we share your information with?

We may share your information with any of the Third-Party Controllers or Sub Processors listed in the Marketing Partners list. Your data may also be shared with future companies promoting the Products and Services listed Automotive Products and Services New & Used Car Sales New & Used Motorcycle Sales New & Used Motorhome Sales Vehicle Servicing & Maintenance Services MOT and Service Reminders Automotive Equipment and Accessories Sales Automotive Parts and Tools Sales Breakdown Services Warranty Services Insurance Services Automotive Technology Sales, Electric & Solar Motoring Sales Charitable Organisations

Aged Animals Armed and Ex Services Arts Birds Children and Youth Community Culture and Heritage Disabled Education and Training Elderly Employment Trades and Professions Environment Family Health Hearing impairments Homeless Horses Hospices Housing Human Rights International Learning Disabilities and SEN Medical Research Medical Welfare Mental Health Overseas Aid Religious Rescue Services Social Welfare Sport and Recreation Visual Impairment Voluntary Groups Wildlife Energy Saving Products and Services Utility Switching Services Household Gas Related Products Household Electricity Related Products Household Water Related Products Smart Meters & Pay As You Go Energy Solar Powered Products Clean Energy Storage Products Alternative Fuels Off Gas Products Central Heating & Boilers Products and Services Energy Efficient Windows and Doors Personal Finance & Insurance Products Personal Loan Services Motor Insurance Products Home Insurance Products Life Insurance Products Medical Insurance Products Mortgage Products and Services Investments and Savings Products Travel Insurance Products Pet Insurance Products Income Protection & Critical Illness Insurance Pension & Retirement Planning Services Funeral Planning Services Gadget Insurance Trust and Will Writing Services Debt Consolidation Services Holiday Products & Travel Services Travel Insurance Products Holiday Booking Services Hotel Booking Services Public Transport Services Private Hire, Coach & Taxi Services Airport Car Parking Services VIP Lounge Access Services Private aero plane and Yacht Charter Services Festivals, Gigs and Concert Products and Services Legal Services Accident Claims Management Services Debt Collection & Tracing Services Debt Consolidation Products Legal Liability Claims Services Legal Protection Claims Services Legal Services Packaged Bank Account Reclaim Products Personal Accident Claims Services Personal Injury Claims Services Personal Liability Claims Services PPI Claims Products Individual Voluntary Arrangement Services (IVAs) Tax Refund Services Accountancy Services Lifestyle Products & Services Astrology & Horoscope Services Betting, Bingo, Casinos, Sports Book, Pools, Lotteries and Gambling Collecting & Hobbies Cricket Related Products, Services and Events Culture Related Products, Services and Events Current Affairs Related Products, Services and Events Cycling Related Products, Services and Events Online and Offline Dating Services and Apps Dining Out – Restaurants, Cafes, Bars and Clubs Environment Related Products, Services and Events Fashion Related Products, Services and Events Fine Art and Antiques Related Products, Services and Events Fishing Related Products, Services and Events Fitness, Exercise and Health Related Products, Services and Events Football Related Products, Services and Events Online Gaming Gardening Related Products, Services and Events Golf Related Products, Services and Events Health and Well being Related Products, Services and Events Leisure Products & Services including Theme Parks and Cinemas Music Related Products, Services and Events Nature Related Products, Services and Events Pets Related Products, Services and Events Reading Related Products, Services and Events Rugby Related Products, Services and Events Running Related Products, Services and Events Stamps and Coins Related Products, Services and Events Swimming Related Products, Services and Events Voluntary work Related Products, Services and Events Alcohol and Wine Related Products, Services and Events Broadband and Internet Related Services and Products Satellite TV, Internet TV and TV Streaming Related Services and Products Electronic Technology Products Mobile Phone Contract Renewal and Network Switching Shopping & Retail Products and Services Online Shops and Stores High Street Shops and Stores Out of Town Shops and Stores Discount Offer Services Retail Sales and Reductions Promotions Mail Order and Catalogue Shopping Group Buying Services Gift Services Family & Home Products and Services Home Construction and Building Products and Services Changing Career, Employment and Job Alert Services Children's Products and Services Computer, Computing and IT Products and Ser Conservatories, Coverings and Awning Services DIY Products and Services Home and Garden Furniture Products Further Education, Learning and Educational Products and Services Garages, Garden Rooms, Sheds Stables and Outhouse Products Health Products and Services Home Appliance Products and Services Letting & Estate Agent Services Public Sector Products and Services Home and Online Selling Products and Services Smoking and Tobacco Products Telephones & Telecoms Products and Services Television Related Products and Services Marketing Service Providers & Data Controllers Third Party Data Controllers Marketing & Advertising Agencies Data Brokers and List Brokers Data Bureaus Credit Referencing Agencies Debtor Tracing Agencies

How can you access the information we hold about you?

You must make a Subject Access Request (SAR) to access information that we hold about you.

A SAR must be made in writing in the form of an email or written letter. In order for us to process your request it is our responsibility to identify you and be satisfied that you are the individual whom the data relates to.

You cannot make a SAR on behalf of someone else unless you have the required written authority or demonstrable Power of Attorney. The simplest way to make a SAR is to email us at compliance@LeadIntelligence.co.uk or alternatively you can write to us at Data Protection Officer, Lead Intelligence Ltd, 71-75 Shelton Street, London, Greater London, United Kingdom, WC2H 9JQ

With any SAR you must include the following information:

- First Name
- Last Name
- Full Address

- The channel from which you have received marketing communication e.g. Telephone Number, Email Address or Postal Address
- A copy of a recent Utility bill (or similar) that verifies your address

When we have received the information outlined above we will contact you to process your SAR.

For more information and advice on what you are entitled to then please carefully read the information from the UK Supervisory Authority here ico.org.uk/for-the-public/personal-information

Our security measures

We are aware of the importance of safeguarding the information under our control and endeavour to take all reasonable steps to protect it. All data collected through from our data contributors is stored on secure servers, and we have stringent security and confidentiality procedures covering the storage and disclosure of such information in accordance with the Data Protection Act 1998. Any data shared is submitted only via secure https sharing platform utilising single user authentication. This platform has full track and trace ability to log when, where and by whom the data was accessed by. However, providing information and transacting over the internet has inherent security risks, and we cannot be held responsible for any breach of security which is outside our reasonable control or not due to our negligence or wilful default.

Changes to our Privacy Policy

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

How to contact us

If you have any comments or queries about this privacy policy, please email us at compliance@LeadIntelligence.com or call us