Connecting Business and Education

www.schoolsmarketingcompany.co.uk

## **Privacy Policy**

Schools Marketing Company (SMC) is a division of Family Marketing Limited, registered with the Information Commissioner's Office, registration number: Z9153578.

SMC are committed to ensuring that your privacy and any data we hold about you or receive from you, is processed and protected in accordance with the law.

Some of the information we collect, research and process may be classified as "personal data" under European Union (EU) law as it is information relating to an individual (e.g. a named contact in a school, nursery or corporate body etc). This privacy notice provides the information we are required to give in relation to the processing of personal data under EU law.

#### **Schools Marketing Company (SMC) Website**

- 1. The SMC website does not collect much information from visitors to our website, other than that which they provide to us.
- 2. We only use information gathered from our website for obvious and transparent reasons, such as if you request information from us, we need to know who you are and how to contact you, so we ask you for that information.
- 3. We do not store credit card details and we do not share our customers details with anyone else, unless required to do so under the law.
- 4. We only use cookies for temporary purposes whilst you are on our site, hopefully to improve your experience of our website and we use Google Analytics to help us understand how customers are using our site, so we can continue improving it.
- 5. We do not disclose any of our customer analytical information to any 3rd parties.

#### **Customers, Enquirers and Prospects Information**

- 1. We hold information about our customers and enquirers about our services, to enable us to contact you.
- 2. We also source information about prospective customers from other GDPR compliant list owners, about businesses who may be interested in our services from time to time.
- 3. We typically hold your name, job title/job function area, company name and address and maybe your work email address.
- 4. We do not store your credit card details and do not share any of your information with any 3rd parties, unless we are required to do so under the law.

Connecting Business and Education

www.schoolsmarketingcompany.co.uk

- 5. Customer and enquirer data is only made available to employees of SMC, or a contractor of SMC who may be employed to process customer data for a marketing campaign for us.
- 6. We may continue contacting you after you have stopped being an active customer or enquirer, as many of our customers' and enquirers requirements are cyclical and occasional and much of the information we send out is generally useful to those who may communicate with the education sector at any time. However, we always offer an unsubscribe option in any communications; and you may request your data be deleted at any time, by emailing your request to: datacontroller@schoolsmarketingcompany.co.uk

#### **Suppliers Information**

- 1. We hold information about our suppliers to enable us to contact them.
- 2. We typically hold their name, job title/job function area, company name and address and often their work email address.
- 3. Supplier data is only made available to employees of SMC, or a contractor of SMC who may be employed to who may be employed to communicate directly with a supplier on our behalf.

#### **Schools and Teachers Commercial Marketing Data**

Schools Marketing Company collects and processes data about education establishments and personal contacts in those establishments, to supply our commercial marketing data and services to other organisations for their marketing, research and data management purposes. This includes the following types of data:

- 1. We collect, hold and update establishment data for UK schools, colleges and nurseries and other education establishments in accordance with the GDPR. We collect, hold and update data about Teachers, Education Management and Administrative Contacts in those establishments in accordance with the GDPR. We provide and licence this information to other companies, agencies and 3rd parties for marketing, research and data management purposes. Our Education data is supplied for marketing purposes where the product or service might be relevant to these contacts in their professional capacity.
- 2. The data we typically hold for UK Schools and Teachers is the school name and address and generic email address and telephone number (in line with the TPS/CTPS) together with information on the school itself, such as the number of pupils on roll and other demographic information that may be helpful in ensuring the marketing communications sent to schools, are as relevant as possible. For Teachers and Administrative contacts in schools, we hold their

Connecting Business and Education

www.schoolsmarketingcompany.co.uk

- name, job title/job function area, school name and address and their individual school email address where provided.
- 3. All marketing and research communications sent out to Schools and Teachers through the Schools Marketing Company on behalf of any clients or their 3rd parties, will always offer an unsubscribe and/or preference option in line with the GDPR.
- 4. All data provided by the Schools Marketing Company to clients and 3rd parties for marketing purposes, has been collected in accordance with the GDPR and is supplied for use by those clients and 3<sup>rd</sup> parties in line with the GDPR.

#### **Grounds for Processing**

We process our commercial data under the grounds of "consent" and/or "legitimate interest".

Schools Marketing Company's legitimate business interest is the supply and licence of this education marketing data and services, to enable the marketing of our clients' businesses to the education sector.

Where we hold consent data, this data has been collected and notified as being for the supply of data and marketing services to other organisations for their own marketing, research and data management purposes, in accordance with the GDPR.

We further comply with the GDPR and ePrivacy Directive as follows:

**Postal Communication/Marketing**: Remains an "opt-out" channel. For postal data, wherever appropriate and proportionate the Schools Marketing Company inform subjects at the point of data collection that the data collected will be made available to 3rd party, commercial companies for marketing purposes.

**Telephone Communication/Marketing**: Telephone numbers are screened against the CTPS (Corporate Telephone Preference Scheme) prior to supply. Outside of this, telephone will remain an "opt-out" channel.

**Email Data**: Different rules apply to email marketing as follows:

- Employees of corporates i.e. limited companies, publicly limited companies, limited liability partnerships and government departments can be emailed without prior consent (this includes schools & colleges).
- Employees of corporates must always be given the option to easily unsubscribe or opt-out from receiving email marketing.
- Sole traders and partnerships are treated as consumers and require opt-in.

Connecting Business and Education

www.schoolsmarketingcompany.co.uk

# What restrictions are there on using Schools Marketing Company data?

Detailed guidelines for data usage appear in our Terms & Conditions (which are on our website, supplied with orders and available on request) however, the following broad principles apply:

When using postal or telephone data supplied by the Schools Marketing Company, all users, controllers, or processors, are agreeing to the following SMC data supply and GDPR data usage terms:

- That the user/3<sub>rd</sub> party data controller/processor will use the data supplied in line with the DPA, GDPR and PECR as relevant and offer an 'unsubscribe or opt-out' to personal data subjects in all their marketing communications.
- That the user/3rd party data controller/processor will be responsible for collecting and maintaining their own opt-out list from any data supplied in line with the GDPR and will cleanse any future data files received from The Schools Marketing Company (i.e. if a 6 monthly data refresh file is supplied under a 12-month data licence) against their own opt-out/suppression list.
- That the user/3rd party processor will refresh any cold telephone data supplied against the TPS/CTPS every 28 days in line with the DPA, PECR and GDPR and will cleanse any future data files or updates received from The Schools Marketing Company, against this opt-out/suppression list.
- That all communications must be relevant and proportionate
- That all communications must contain a clear opportunity for data subjects to opt-out from future correspondence and users of SMC data must maintain their own suppressions lists for any data supplied to them directly from data subjects or other third parties.

#### Data subject access and removal requests

Subject access requests and requests for removal/suppression from the SMC database should be addressed to:

The Data Controller

Schools Marketing Company

Phoenix House

24 High Street

London

E11 2AQ

Connecting Business and Education

www.schoolsmarketingcompany.co.uk

Telephone: 020 8530 7801

Email: datacontroller@schoolsmarketingcompany.co.uk

If you have any questions or comments about our services or our privacy policy, please feel free to contact us at the address or contact methods shown below:

Schools Marketing Company, 1st Floor Phoenix House, 24 High Street, London, E11 2AQ

Tel: 020 8530 7801

Email: <a href="mailto:enquiries@schoolsmarketingcompany.co.uk">enquiries@schoolsmarketingcompany.co.uk</a>

Web: www.schoolsmarketingcompany.co.uk