

## Schools Marketing Company Data Compliance Information

### About SMC

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

### About the GDPR

The EU General Data Protection Regulation (GDPR) came into force in UK law on 25th May 2018. The GDPR replaces the 1995 EU Data Protection Directive (European Directive 95/46/EC) and when read in conjunction with the existing Privacy and Electronic Communications Regulations (PECR) – (which governs telephone and electronic marketing channels i.e. email marketing and text marketing etc.) the GDPR provides clear regulations for processing marketing data.

The Schools Marketing Company in conjunction with advisory and regulatory bodies, has worked to ensure that the data and services we process and supply, are compliant with the new legislation.

### What are the rules on B2B (which includes SCHOOLS) marketing data?

For the purposes of B2B/Schools marketing data bought from Schools Marketing Company, the following rules apply (Full details on the GDPR can be found at the [Information Commissioner's Office website](#)).

- **Postal mailings** continue to be an opt-out channel. You need to give recipients the opportunity to opt out of future mailings from you.
- **School Telephone numbers** (where supplied) must be screened against the Telephone Preference Service and Corporate Telephone Preference Service files prior to use, and subsequently every 28 days. Telemarketing communications are also an opt-out channel.

Business-to-business(School) email communications fall into two categories of regulation as follows:

- Emails to the employees of corporate entities (which includes schools) – limited companies, public limited companies, limited liability partnerships and government departments (including schools and hospitals) can be emailed without consent. Individuals must be given a clear and easy means of opting-out from future communications.
- Emails to sole traders and traditional partnerships are treated in the same way as consumer data, and opt-in consent must be gained for these contacts.

Note: Schools Marketing Company only provide data or offer email marketing services for emails at corporate bodies and for corporate staff.

## **Schools Marketing Company - Database Overview and Compliance Information**

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

Schools Marketing Company collect and hold information from and about teachers and related staff in UK schools. We provide this information to others specifically for purposes of direct marketing and we offer managed email services to them, where the product or service might be relevant to them in their professional capacity. None of the data is collected as a by-product of other commercial activities.

### **How we source and research our data**

Schools Marketing Company research and gather data through a variety of sources including surveys to schools and teachers, incentive programs, comparison with publicly available information from local education authority and government data, together with desk, telephone and online web research.

The cross-checking and comparing of data from a number of public and direct response sources, enables greater accuracy and ongoing verification of data. Data accuracy is a key requirement of the GDPR and in line with this we also employ a desk based, full-time data research team to oversee all updates and amendments to our schools and teachers' database, on an ongoing basis.

### **What Personal Information do we collect?**

We are a schools, colleges and nurseries (business/corporate) data provider and data supplied typically consists of data subject name and job specialism at school address, for the distribution of information related to their professional roles.

The schools and teacher's data we routinely collect includes:

- Named contacts in schools (corporate) establishments
- Personal email addresses in schools (corporate) establishments
- Job Titles/Job Function Areas
- School name, address and phone number (in accordance with the TPS/CTPS)

We do not collect any special categories of personal data, as defined under the GDPR. None of our data products and services are aimed at children or other vulnerable individuals.

## **Do we obtain consent from individuals on our database? What is our basis for processing personal data?**

Consent is one of six equally valid grounds for the processing of personal data under GDPR.

Due to the nature of our data, we do not consider consent to be the most appropriate grounds for processing. We process personal data based on the legitimate interest model.

Our grounds for processing data under the Legitimate Interest model are based on the following Legitimate Interests impact assessment:

- Schools Marketing Company's (SMC) legitimate commercial interests together with those of their clients, necessarily entails the processing of personal data of education and school management professionals at business corporate address, for the distribution of lawful marketing communications about resources relevant to their professional roles.
- SMC act as a supplier of marketing data and services to client companies. In many cases, individual data subjects have communicated specific preferences, updates or other communication to facilitate the distribution of relevant resource information.
- The data processed is proportionate and limited to the legitimate interest and purpose for which the data is used. Schools regularly cooperate in the data gathering process and have done so historically, as the receipt of educational resource information via this means has been perceived as valuable or useful.
- The data processed is regularly used by companies whose products and services introduce and drive innovations in education; who distribute free education resources; promote national awareness campaigns and publicise conferences/events of professional interest.
- The processing of teacher/staff names, job functions/specialisms at school addresses on an ongoing basis, enables educational resource companies and companies wishing to communicate with schools and teachers, to direct their communications to the most relevant contacts.
- Where appropriate and proportionate we offer an opt-out at point of data collection or first usage and we take immediate action to remove individuals who request that we do so, and we maintain suppression files to ensure that people who have asked to be removed, are not added back-in at a later date.

We have assessed our and our clients' business interests in carrying out marketing activities and have carefully balanced them against the impact the collection and use of this personal corporate data could potentially have on individuals' rights. Our assessment concludes that the individuals' rights are not unduly impacted by our Legitimate Interest processing.

## **Using Schools Marketing Company Data or Managed Email Services for marketing purposes**

When using The Schools Marketing Company managed email service, the control and processing of teachers and educators (corporate) personal email data is in accordance with the GDPR and PECR as detailed above.

When using data supplied by Schools Marketing Company the following broad principles apply:

- All communications to data subjects must be relevant and proportionate – as well as legal, decent honest and truthful.
- All communications sent out should identify the end-user of the data and must contain a clear opportunity for data subjects to opt-out from future correspondence from the end-user.
- End-users should endeavour to keep the data supplied up to date through reasonable contact frequency and should record any changes.
- All requests to opt-out must be honoured by the end-user and steps should be put in place not to re-contact a data subject through data refreshes or updates, once they have opted out.
- Detailed guidelines and usage restrictions can be found in our Terms & Conditions.

## **How is our data cleaned?**

Our data files are updated on a daily basis through a variety of methods, to ensure that maximum deliverability is maintained.

Telephone numbers are run against the Telephone Preference Service and the Corporate Telephone Preference file prior to supply.

Schools Marketing Company respects the rights of individuals to have their details removed from our active file at any time.

We remove any individuals who have indicated they no longer wish to receive direct marketing material.

## **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

# **schools marketing company**

---

Connecting Business and Education

[www.schoolsmarketingcompany.co.uk](http://www.schoolsmarketingcompany.co.uk)

London

E11 2AQ

Email: [datacontroller@schoolsmarketingcompany.co.uk](mailto:datacontroller@schoolsmarketingcompany.co.uk)

Schools Marketing Company (SMC) is a division of Family Marketing Limited, registered with the Information Commissioner's Office, registration number Z9153578. Registered in England No. 5491020.

Whilst every effort is made to ensure the information provided here is accurate, this relates to data and services supplied by Schools Marketing Company and is not intended as specific or general guidance on data protection. If you are concerned about any issues relating to the GDPR or PECR you should seek independent legal advice.