



## Direct Marketing Customer Charter

When you purchase a product or service online or in store or create an account with us, we collect personal information about you to let you know about our latest products, services or offers.

We may do this by post, email, text message, online, by using social media or by sending you push notifications through our apps.

We'll only use your personal information to send you marketing messages if we have a legal right to do so. That could be either with your explicit consent or where there is 'legitimate interest', like when we have a business or commercial reason to use your information. We'll always provide you with the opportunity to opt out of marketing when we first collect your contact details and in every subsequent message.

We may ask you to confirm or update your choices, if you purchase any new products or services with us in future. We'll also ask you to do this if there are changes in the law, regulation, or the structure of our business.

The personal information we have about you is made up of what you tell us, and the data we collect when you use our services, or from third parties we work with, like Experian PLC.

We also gather statistics about email opening and clicks, using industry standard technologies to help us monitor and improve our e-newsletters.

We won't send unsolicited one-to-one (direct) marketing email and/or SMS communications unless they comply with the rules of General Data Protection Regulations and Privacy Electronic CR and related guidance.

Specifically, our promise to you is that:

- I. We'll always ask you to actively opt-in to receiving direct marketing messages. That is unless we're contacting you about our own similar products during the course of a sale, and we offered you the opportunity opt-out when you gave us your details.
- II. Our store and contact centre colleagues will always inform you about any further use of your contact details for direct marketing when you make a purchase
- III. We'll offer you a choice of how you would like to receive marketing from us, including email or text.
- IV. We'll make sure that the products or services we are marketing are the same or similar to the ones you originally consented to receive marketing for



- V. We'll ask for your consent to pass details to third parties for marketing. And we'll name those individual companies when we request your consent.
- VI. We'll record when and how we obtained your marketing consent, and exactly what it covers
- VII. We'll make sure the language we use when you consent is 'clear and easy to understand, and that it's clearly distinguishable from any other matters, including other Terms & Conditions
- VIII. We won't use confusing language in our marketing statements, including the use of double negatives, technical or legal jargon and confusing terminology or inconsistent language.
- IX. For telephone and postal marketing communications, we'll screen your name and contact details against the Telephone & Mail Preference Service
- X. We'll always offer you the option to opt out of direct marketing at the point when we capture your contact details and in every subsequent communication, by either replying to the communication or by clicking the unsubscribe link)
- XI. We'll make sure we promptly opt you out of all of our marketing activities on your request. We'll make sure there is always a simple, easy-to-access and free of charge way for you to withdraw your consent.
- XII. We'll operate and maintain an in-house suppression file – listing the names and contact details of customers who have told us they don't want to receive commercial communications through all or particular means of communication
- XIII. We'll rely on the legitimate interests of the business (as an alternative to explicit consent) when we undertake postal marketing, when we conduct live outbound phone sales or when we're contacting our business customers. We'll include information in our telephone scripts and in all postal marketing on how to opt out of receiving such marketing.
- XIV. We'll screen data to remove files of deceased people so that they are not used for marketing
- XV. We will not send you any direct marketing if you haven't been in touch with us or purchased from us in the past three years.
- XVI. We have procedures for dealing with inaccuracies and complaints.



- XVII. We'll cooperate fully with any investigation by the Information Commissioners Office (ICO) in relation to our direct marketing activities.

#### Bought in lists

We'll only use bought-in lists for texts, emails or recorded calls where we have proof of opt-in consent which specifically names us.

- I. We'll only use the information on the lists for marketing purposes
- II. We'll delete any irrelevant or excessive personal information
- III. We'll screen the names on bought-in lists against our own list of customers who say they don't want our calls.
- IV. We'll carry out small sampling exercises to assess the reliability of the data on the lists
- V. When marketing by post, email or fax, we'll include our company name, address and telephone number in the content
- VI. We'll always tell customers where we obtained their details
- VII. We'll provide you with a privacy notice, where it is practical to do so.
- VIII. We'll undertake adequate due diligence when we first select data suppliers and in our ongoing work with them in order to make sure it has received and used personal data fairly
- IX. We'll make sure that adequate contractual terms are in place requiring data suppliers to make sure personal data was obtained and provided fairly and in accordance with the requirements of GDPR
- X. We'll take all necessary steps to satisfy ourselves that the data has been properly sourced, permissioned and cleaned. We'll make sure that sufficient due diligence is undertaken and contractual arrangements are in place with suppliers of personal data