



# Direct Marketing Policy

## Statement:

Squaricle Group views security and privacy as integral to the function of the business. This commitment ensures compliance with the General Data Privacy Regulations. Keeping our staff informed and policies enforced is a crucial aspect to this commitment.

This document outlines the Marketing Policies and Procedures across Squaricle Group. It has been prepared to highlight key objectives and ensure consistency throughout all Marketing activity.

- 1.1 A point of reference for staff to understand marketing policies and to outline the procedures of marketing activities.
- 1.2 To state the correct procedures and what is expected of stakeholders if marketing support is required.
- 1.3 To ensure good practice within the Marketing Team.
- 1.4 To ensure consistency through all Squaricle Group marketing activities.

## Consent:

- 2.1 Squaricle Group uses opt in boxes where appropriate alongside legitimate Interest.
- 2.2 Where Legitimate Interest is used as a legal basis for marketing it may be necessary to complete a legitimate Interest Assessment

## Marketing by Email, messaging or Text:

- 3.1 We only email with opt-in consent unless contacting previous Customers about our similar products. We may also market if a legal basis other than consent is considered right.
- 3.2 We offer an opt-out either via reply or an unsubscribe link.



- 3.3 Individuals who opt out are automatically removed from the direct marketing list and can only be contacted in response to their specific enquiries.

#### **PECR:**

- 4.1 The Privacy and Electronic Communications Regulations (PECR) sit alongside the Data Protection Act and the UK GDPR. They give people specific privacy rights in relation to electronic communications.

There are specific rules on: marketing calls, emails, texts and faxes; cookies (and similar technologies); keeping communications services secure; and customer privacy as regards traffic and location data, itemised billing, line identification, and directory listings.

This covers the latest version of PECR, which came into effect on 29 March 2019.

- 4.2 This means that if you send electronic marketing or use cookies or similar technologies you must comply with both PECR and the UK GDPR. Naturally, there is some overlap, given that both aim to protect people's privacy. Complying with PECR will help you comply with the UK GDPR, and vice versa – but there are some differences and you must make sure you comply with both. In particular, it's important to realise that PECR apply even if you are not processing personal data. For example, many of the rules protect companies as well as individuals, and the marketing rules apply even if you cannot identify the person you are contacting.

- 4.3 Latest changes (2019) are summarised as this: *You must tell people if you set cookies, and clearly explain what the cookies do and why. You must also get the user's consent. Consent must be actively and clearly given. There is an exception for cookies that are essential to provide an online service at someone's request (eg to remember what's in their online basket, or to ensure security in online banking). The same rules also apply if you use any other type of technology to store or gain access to information on someone's device.*

#### **Auditing:**

- 5.1 We know what cookies our online service either already uses or intends to use.
- 5.2 We have removed any cookies that we don't need.
- 5.3 We have confirmed the purposes of each cookie.



5.4 We identify what information each cookie processes, including whether they are linked to other information we hold about our users or otherwise involve processing personal data.

5.5 Where personal data is involved, we have ensured that we process this data in line with the requirements of the UK GDPR.

5.6 We have confirmed whether our cookies are session or persistent cookies.

5.7 We have confirmed whether our cookies are first party or third party cookies.

5.8 We have appropriate arrangements in place for the use of any third-party cookies, including what information they share with any third party, how it is shared, and what our users are told.

5.9 We have established how long our cookies last and that this duration is appropriate.

5.10 We have identified those cookies that are strictly necessary, and those that are not.

**Compliance:**

The Director of Operations: Brands, People & Quality is responsible for maintaining and implementing the Direct Marketing Policy on behalf of Squaricle Group.