

## WHO WE ARE

We engage and specialize in the provision of consumer data, through marketing questionnaires, for the purpose of lead generation.

## WHAT MAKES US DIFFERENT?

- We are adept at generating high quality leads and have strong faith in our own abilities in this area. We have our own brand, "MyCharitySurvey.com" (MCS), and our own website, <http://www.mycharitysurvey.com>. We have been generating "opt in" leads through our brand since 2008.
- Consent is defined in the European Directive 95/46/EC (the data protection directive on which the DPA is based) as: "any **freely given, specific and informed** indication of his wishes by which the data subject signifies his agreement to personal data relating to him being processed." We are meticulous in ensuring that we always obtain valid consent from our customers. (Please refer to attached "Opt-in Statements" for more information).
- We do not purport to be a market research firm. We conduct marketing questionnaires and our customers are clearly informed of its purpose, irrespective of the method by which they opted in (i.e. whether online or via a marketing questionnaire call). The same is also displayed on our Privacy Policy and Terms & Conditions on our website.
- We have our own TPS license. All records are TPS screened daily in-house rather than using an external service. TPS flagged records will require a PTC opt-in source.
- We are operating our own in-house online sites which offers a much higher level of "Permission to Call (PTC)" and compliance.
- We ensure that we receive explicit and prior consent from our customers by using an "Opt-in Box" on our online sites. We also have an "Opt-out Page" on our MCS website where customers can opt-out if they choose to.
- We ensure that our brand opt-ins are within 6 months from our PTC. Our output file format includes the PTC source code and Brand Opt-in Date. Our clients can choose a percentage of random calls by Unique Reference Number (URN) and Source Code from the TPS records and we will supply the PTC opt-in date and details.
- When customers opt-in to our brand on our online sites, we call them and opt them in again on the phone thereby ensuring that we always obtain valid consent.
- We do not take advantage of vulnerable people. We have a Social Responsible Calling Policy and Procedure which helps us ensure that our representatives deal with our customers honestly and courteously at all times.
- We pride ourselves with the quality processes we have in place. We require and store 100% recording of all calls and we conduct extensive quality checking and monitoring of successful transactions.
- We have our own in-house Compliance Department. Our Compliance Officer attends to customer and client opt-out requests and complaints, handles and conducts immediate investigations on the calls made to customers pursuant to their feedback, and ensures that our company is in compliance with all the regulations, directives, and legislations in the United Kingdom, particularly the DPA and PECR.
- We maintain our own DNC suppression database and make the same available to our clients if requested for their own suppression.

## WHAT IS CONSENT?

Consent is central to the rules on direct marketing. Before any organisation can send marketing texts, emails or faxes, make calls to a number registered with the TPS, or make any automated marketing calls under PECR, they will need the individual's consent. Moreover, in order to pass customer details to another organisation, consent must also be obtained under the data protection principle. Inability to demonstrate valid consent puts the organisation at risk of enforcement action.

How should consent be obtained?	Marketing Questionnaire Call	Online Marketing Questionnaire	Charity Rating Questions
<b>FREELY GIVEN</b>	We clearly indicate the purpose of the call through our mandatory opt-in statement and customers are asked if they would like to proceed. If the customer answers "no", we shall then thank the customer for their time and politely end the call.	We ask customers to tick an opt-in box as an indication of positive consent.  And to further strengthen our advocacy to ensure that valid consent is obtained at all times, we also provide customers an option to opt-out at the end of each marketing questionnaire.	A tick box is provided where customers can opt-in to be contacted by phone by MCS and its affiliates as well as the charities listed in the questionnaire:
<b>SPECIFIC</b>	We inform our customers that they may be contacted by MCS and its affiliates, our charity partners, the charities and organisations name in the marketing questionnaire. We also advise them that method of communication may be via phone, SMS or e-mail.		
<b>INFORMED</b>	To satisfy an informed consent, as defined by the regulations, our Privacy Notices, Terms, and Conditions are displayed clearly and visibly on our websites in keeping with our company's policies on full disclosure and transparent business practices.		
<b>AN INDICATION SIGNIFYING AGREEMENT</b>	Our representatives are required to always provide the mandatory opt-in statement before proceeding with the marketing questionnaire call to ensure that valid consent is obtained at all times. There MUST be a positive expression of interest from the customer to continue with the call.  We are exceptional in the industry as we always take careful steps to ensure that we are not misleading our customers as to the purpose of the call.	Our customers must tick on an opt-in box as indication of valid consent. It is also necessary for them to take a positive action by clicking on a button before completing the registration. This supports the ICO's interpretation that "clicking of an icon" indicates that the individual knowingly gave his/her consent.  We also provide customers with a choice to opt-out at the end of each marketing questionnaire by ticking on an "Opt-out Box" prior to clicking the 'submit' button. This step further strengthens our compliance to the marketing guidelines.	As stated in the ICO's Direct Marketing Guidance, the best practice is to provide an unticked opt-in box, and invite the person to agree by ticking. This is the safest way of demonstrating consent, as it requires a positive choice by the individual to give clear and explicit consent.  Hence, in our charity rating questions, a tick box is provided where customers can opt-in to be contacted by phone by MCS and its affiliates as well as the charities listed in the questionnaire:

## OPT-IN STATEMENTS

Our scripts and opt-in statements are carefully written and designed to ensure that we obtain valid consent at all times.

### Marketing Questionnaire Call:

*“MyCharitySurvey.com, our charity partners, the charities and organisations named in this questionnaire may wish to contact you by phone, SMS or e-mail, regarding your potential interest to support good causes and give you more information about their products and services. You can opt out anytime by visiting our website, [www.mycharitysurvey.com](http://www.mycharitysurvey.com).”*

Shall we proceed? Yes/No



### Online Marketing Questionnaire:

I accept the Terms and Conditions Through signing up you are agreeing to our Terms & Conditions and Privacy Policy. You also agree to receive information by telephone, email and SMS from ourselves and our third party sponsors. You can unsubscribe at any time.

We also provide customers an option to opt-out at the end of each marketing questionnaire:

*By signing up to this service, you agree to us, MyCharitySurvey.com and its affiliates, our charity partners, the charities and organisations named in the questionnaire contacting you by phone, SMS or email to tell you about their causes, products and/or services. If you do not want to be contacted, please tick here*



### Charity Rating Questions:

Please tick the appropriate box to continue:

I agree that I am above 18 years of age, I will only submit one entry per competition and I have read the Competition Terms and Conditions.

I agree to MyCharitySurvey.com, and its affiliates, and the charities listed above in this questionnaire contacting me by phone to tell me about their causes and gauge my personal interest in supporting their charitable works.

By clicking on the Submit button, you agree to the above (where you have ticked the appropriate box), and to our Terms & Conditions and Privacy Policy.

Excellent	★★★★★
Very Good	★★★★☆
Good	★★★☆☆
Fair	★★☆☆☆
Poor	★☆☆☆☆

## SOCIALLY RESPONSIBLE CALLING

We have a Policy and Procedure in place to ensure that we do not take advantage of vulnerable people (Full policy available by request).

### EXCLUSION, DUTY OF CARE AND RESPONSIBILITY

- ✓ MycharitySurvey.com ensures that if the person we are talking to requests that we never call them again, we remove them from our calling list by marking them as Do Not Calls (or Never Calls).
- ✓ If the person we are speaking to does not understand what we are telling them, or doesn't engage in conversation and responds to everything we say with 'yes', and we have doubts if we should proceed with the survey, we ALWAYS CHECK with senior staff.
- ✓ If we are unsure of a person's age – we politely ask if they are over 18.
- ✓ All information given to our prospects must be accurate and clear – we follow our call structure and mandatory scripts.
- ✓ If a person who answers the phone is too old or unwell – we apologize and end the call politely.
- ✓ We are sensitive when the person we are talking to has learning or physical disabilities.
- ✓ We are trained to identify if the individual has alcohol or drug use problems.
- ✓ We are trained to be able to identify if the individual has mental illness.
- ✓ A sensitive communication strategy will be capable of engaging with disadvantaged groups via sensitive and responsive telephone discussion in an appropriate way e.g. resisting the temptation to speak louder as a reaction to someone who does not speak English very well; instead choosing to eliminate the use of metaphors and phrases like 'second to none', speaking at a steady pace using standard non-embellished language.
- ✓ We make ourselves the person on the other end of the phone – we try to see what the other person sees
- ✓ Timeframes set for outbound calling is carefully considered. The systematic targeting of talk times may well be counter-productive; on the other side the person should not be given cause to feel 'hostage' on the phone either. Hence a careful balance is required regarding talk times, with some element of flexibility built into to efficiency targets.
- ✓ If the customer is over 75 years old, we will not supply the record to our clients unless specifically requested. (NOTE: Age is not always reliable as it depends on the accuracy of the information provided by the customer).

## VERIFICATION TASKS & ESCALATION PROCEDURES

We conduct robust monitoring through Quality Assurance listening and monitoring of calls.

We have implemented an Escalation Process to ensure that any call which is a possible SRC violation will undergo at least 2 levels of verification and if confirmed to have violated the SRC standards will be handled accordingly.

### Verification Level 1 (VL1):

Calls are reviewed and evaluated by QC Verifier and QA Officer through listening to the call recording. Any possible violation of SRC standards means escalation to QA Manager for further review (VL2).



### Verification Level 2 (VL2):

QA Manager reviews all calls in this category. He/she will make the final decision if there was a SRC violation was committed. He/she will also provide a recommendation on action plans and/or disciplinary action that should be taken.