

## Privacy Policy

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*Last updated: V1 - 3<sup>rd</sup> July 2024*

### Who we are?

PDV Ltd is a direct marketing organisation. We work on behalf of some of the UK's leading brands to help them target their products and services better.

We are registered in England and Wales under company registration number 03974954, and our registered office is at Green Heys, Walford Road, Ross-On-Wye, Herefordshire, HR9 5DB.

We are registered with the Information Commissioner's Office (ICO) under registration Z720633X.

You can contact our Data Protection Manager at: PDV Ltd, Sunningdale, The Belfry Business Park, 13 Colonial Way, Watford, Herts, WD24 4WH. Or by email at: [compliance@pdv.agency](mailto:compliance@pdv.agency).

This privacy policy relates to 1. consumer enquiries, 2. job applicants and 3. client / supplier enquiries.

### 1. Consumer Enquiries

PDV Ltd primarily acts as a Data Processor, working under contract on behalf of Data Controllers. Where you contact us believing we have processed your information, we will pass your enquiry onto the Data Controllers who provided your information. We will also, under their instruction, respond to you to let you know who the Data Controller is and how you can contact them should you wish.

We are unable to pass your details onto a Data Controller where we have not processed your information prior to your enquiry. In this instance, we will become the Data Controller for the very small amount of data that we process in order to respond to your enquiry. This Privacy Policy describes the processing of this information.

### What information do we hold?

The [pdv.agency](http://pdv.agency) website includes a Consumer Enquiries form. When you submit your enquiry through this form, it will include first name, last name, postal address and email address. If you submit your enquiry via any other means (e.g. by post or email), the information we hold will be only the information you volunteer to us in your correspondence.

### What do we use your data for?

We will only use your information to respond to your enquiry and not for any other purpose. This will often be to confirm to you that we do not process your information. The information you have submitted will be held securely and not added to any database or processed for any other reason.



## Legal Basis.

The legal basis we rely on is Legal Obligation, as the processing is 'necessary' for compliance. Whilst the processing is not essential for us to comply with the legal obligation, it is a reasonable and proportionate way of achieving compliance as we have no discretion over whether to process the personal data, or if there is another reasonable way to comply.

## Your rights.

The Information will be kept for a maximum of 6 months from the last correspondence date. During this period, you will have the following data subject rights:

- A. Right to be informed** – This document acts as your right to be informed.
- B. Right of access** - You have the right to contact us verbally or in writing to request details of the information we hold about you.
- C. Right of rectification** - You have the right to ask us to rectify information that we hold about you if it is inaccurate or incomplete.
- D. Right to erasure** - This is also known as the right to be forgotten and gives you the right to request your information be removed.
- E. Right to lodge a complaint with a supervisory authority** - If we cannot deal with your enquiry to your satisfaction, you also have the right to complain to a relevant supervisory authority;

The Information Commissioners Office; Wycliffe House, Water Lane, Wilmslow, SK9 5AF, or call: 0303 123 1113 or online at <https://ico.org.uk/make-a-complaint/>

## 2. Job Applicants.

When individuals apply to work at PDV they will submit their information to us for processing. We will only use the information to process their application.

Information about unsuccessful candidates will be held for a maximum of six months after the recruitment process has been completed.

## 3. Client and Supplier Enquiries.

PDV may collect and process the following categories of personal data about you: name, job title, company information and contact details such as email address, phone number and postal address.

We collect this data in the following ways:

- When you contact PDV and request information about our products or services. This may be via our website, by telephone or by email.



- Information from sources in the public domain, such as LinkedIn or company websites.
- Or via third parties, such as Pearlfinders Ltd.
- When PDV collaborates with our clients e.g. at trade events. In these instances, PDV and the client will both be clearly identified and will share the information. Each Controller determines the purposes and the means of the processing of the Information separately.

The data may be processed for the purposes of providing our services, maintaining back-ups of our databases and communicating with you. We process data in this way as a Data Controller and we will only retain your data for as long as it is necessary.

### How we use your personal information.

We may use your personal data for the following purposes:

- To maintain a database of prospective, current and previous clients or suppliers.
- To respond to your enquiry or fulfil your request.
- To send you news about PDV and our services.

### Legal Basis.

We will process your data under the following legal basis:

- Performance of a contract between you and us [or your employer] and/or taking steps, at your request, to enter into such a contract.
- Where you have given us your consent to do so. This will be for marketing purposes to an individual via electronic methods, such as email.
- In some cases, we may also rely on Legitimate Interest as our lawful basis where we use your data for other forms of marketing, such as postal, or in order to operate our business and improve our services.
- Where we have a Legitimate Interest to send you marketing communication via electronic methods such as email where PECR doesn't apply such as sending a news letter to a corporate subscriber.
- Or if we need to comply with a legal obligation.

### Who we may share your data with.

To help us run our business effectively, we may share your data with third party service providers such as credit insurance, CRM software and marketing fulfilment companies.

### Your rights

You can opt-out from receiving our marketing communications or ask us to delete your personal data from our CRM databases at any time. To do so, please send your request to [hello@pdv.agency](mailto:hello@pdv.agency).

