



Paul Faulkner

Data Protection & GDPR Privacy Policy

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Privacy Policy

As a responsible marketing / telemarketing professional, I take the privacy of my existing and prospective clientele and that of their existing and prospective customers whose data I may process on my or any one of my clients' behalf seriously!

Like all UK and EU entities large and small, I must and will comply with The General Data Protection Regulation (GDPR) to make sure everyone's data which I use / process or otherwise have access to is done so and then stored and kept as safely as possible.

My Privacy Policy explains how I use personal data in my care, describes the categories of personal data I process and for what purposes I use it. I am committed to collecting and using data fairly and in accordance with the requirements of GDPR and all other data protection legislation; not just to a minimum standard but to a best practices standard where these exceed the law's requirements. My policy also explains individuals' privacy rights and how I gather, use and share information about the individuals whose data I process or control.

Acknowledging the individual's rights

Any and every individual has the right to object to how I might process his (her) personal information. I absolutely understand too that individuals also have the right to access, correct, sometimes have deleted or otherwise restrict the personal information I may have or use pertaining to them.

In addition, if having exhausted avenues of complaint to me, there is a right to escalate a complaint the UK's data protection regulator; The Information Commissioner's Office at: www.ico.org.uk.

0. Preamble

0.1 I can be contacted by email at: gdpr@paulfaulkner.co.uk. May I ask of anyone wanting to make subject access requests or requiring me to stop ringing or emailing them that they help me to do so by letting me know what company or entity I had called or emailed from along with any other information such as the date / email address / name of the person I'd (tried to) contact(ed). So I can find them.

0.2 I have no problem with people approaching me to sell to me in an appropriate fashion as it's what makes the economic world go round – but please don't use this email address to do so, namely gdpr@paulfaulkner.co.uk because it's been set up solely for GDPR purposes as outlined below.

1. Introduction

1.1 I take people's privacy seriously and list here about those privacy rights and how I gather, use and share personal information - this includes the personal information I already hold about individuals now and any further personal information I might collect about such individual data subjects, either directly from them or from third parties. How I use such personal information I have collated will depend on the nature, products or services whichever of my clients provide - or indeed I myself do or would like to provide to each individual's business.

1.2 I am committed to applying the highest standards in protecting the personal information in my care and am continually evaluating and improving my processes on behalf of my clientele in the best interests of each and individual data subject.

1.3 This Privacy Notice provides up to date information about how I use personal information and will supercede any previous material I may have given published about using personal information (also referred to as personal data). I will update this Privacy Notice if I make any significant changes affecting how I might use personal information, and if so I will contact the principals of those affected to let them know about the changes I will be making where I am a 'data processor' or the individuals concerned directly where I am acting as 'data controller'.

2. About me

My name is Paul Faulkner. I am a self employed individual offering bespoke telemarketing services to all manner of businesses. I am both what is known as a 'controller' or 'data processor' of the personal information I gather and use. I am a 'controller' in relation to information gathered / processed / stored about my own existing, prospective or past clients. I am a 'data processor' in relation to information gathered / processed / stored where I do so on behalf of any one of my existing clientele.

3. Individual's privacy rights

3.1 Individuals have the right to object to how I use their personal information. Individuals also have the right to see what personal information I might hold about them. In addition, they can ask me to correct inaccuracies, delete or restrict my use of their personal information or to ask for some of their personal information to be provided to someone else.

3.2 If necessary an individual whose data to which I have some form of access / control may make a complaint to me regarding his (her) data by emailing: gdpr@paulfaulkner.co.uk. An individual can also escalate a complaint to the UK's data protection supervisory authority, the Information Commissioner's Office, which can be found on the internet at: www.co.org.uk.

3.3 An individual can object to my processing of his (her) personal information. If desired, anyone can contact me as outlined above, providing details of the objection and what remedial action is desired to be taken.

3.4 An individual can request to be furnished with a copy of his (her) personal information which I hold, along with an explanation covering what personal information I use, why I use it, who I share it with, how long I intend to keep it for and whether it has been used for any automated decision making.

3.5 Individuals can make a request for a copy of the data I hold about them free of charge by contacting me indicating that they are making a GDPR Subject Access Request. Requests for access must be in writing by email and I may likely need to be provided with evidence proving the identity of the person who is the subject of the request and, where the subject has delegated the request, of the identity of the 3rd party so requesting.

3.6 Where I have been given consent by an individual to use his (her) personal information, any such individual can withdraw his (her) consent at any time by emailing gdpr@paulfaulkner.co.uk.

3.7 An individual can ask me to amend or complete any inaccurate or incomplete personal information held about them by emailing gdpr@paulfaulkner.co.uk.

3.8 An individual can ask me to delete his (her) personal information where it is no longer necessary for me to have / keep it, where such an individual has withdrawn his (her) consent, or where it is believed I have no lawful basis for keeping it by emailing gdpr@paulfaulkner.co.uk.

3.9 An individual can ask me to provide him (her) or a third party with some of the personal information which I hold about him (her) in a structured, commonly used, electronic form, so it can be easily read and later transferred by them should they wish.

3.10 An individual can ask me to restrict the personal information I use about him (her) where he (she) has asked for it to be erased or where he (she) has objected to my use of it.

3.11 If an individual feels it necessary, he (she) can make a complaint about how I have used his (her) personal information initially to me by emailing gdp@paulfaulkner.co.uk or if he (she) then wishes to escalate matters he (she) may do so by contacting the UK GDPR supervisory authority, the Information Commissioner's Office on the internet at www.ico.org.uk.

3.12 I will not make any charge for responding to any request from a data subject in exercising his (her) privacy rights and I will respond to such requests in accordance with my obligations under GDPR. I think it reasonable that a person making a subject access request or complaint should help me identify how I will have made contact with them (for which of my clients or me) so I can find their data.

4. What kinds of personal information do I use and collate.

I collate / use a very small amount of personal information. This is generally limited to someone's name, email address and job title / function. However, I also store contemporaneously typed brief notes of conversations which I will have had with the individuals themselves or their colleagues about the relevant and specific business matters discussed but these notes may also encompass other very light personal information such as for example going on holiday, liking playing golf, having had a baby or perhaps a dog called Ben *or any one of a myriad of other 'light' topics*. I make notes of this other information purely on the basis of picking up a conversation where it will have been left off (ie continuity). I don't record / make notes of 'other matters' in any depth or for any reason other than to help pick up a conversation where it will have been closed. Eg "*I hope you're feeling better (on coming out of hospital).*" "*Did you have a good time in the South of France?*" "*Did you manage to find Ben (the lost dog)?*" Anything I consider which could embarrass or compromise the data subject to any degree is simply **not recorded**. Such an example might be that I might have actually been told that "*Joyce isn't at work today because her son was arrested last night and she's had to go to the police station to secure his bail.*" Sure, I'd make a note that Joyce wasn't in on me calling but this would just and only be recorded / noted as "*an urgent absence of a personal nature*". Documenting all the possibles here would be like trying to explain every possible move on a chess board: I have a very good idea of what is reasonable and appropriate and where I'm unsure or hesitant, I simply omit making a note of any given thing I've been told.

5. How I gather personal information

I most often obtain personal information directly from having conversations with the individuals concerned themselves, eg *Mrs Smith tells me herself that her name is Joyce Smith that she is the office manager for Some-Entity Ltd and that her email address is joyce.smith@someentity-domainname.com*. However, I may also quite likely have been told (using the notional example name supra) on asking for the office manager on calling Some-Entity Ltd that I need to speak with a Joyce Smith but that she's difficult to get hold of / out at lunch / on holiday (or anywhere else – but certainly unavailable) but that I should send her an email to joyce.smith@someentity-domainname.com. Sometimes I only get a name and no email address but told to call back; in which case I will do that – and only at a reasonable interval.

6. How I use personal information

To be able to introduce myself and / or keep in touch with prospective business customers of myself (as data controller) or for and on behalf of my own clientele (as data processor) when ringing around for them. These would be people whom I will ultimately ideally need to make and stay in periodic contact with. In order for any of the businesses I work for to successfully be able to provide their prospective customers with their products and services, I ultimately do need to know relevant individuals' contact details. I will use the personal information I discover or am given about the key individuals in target businesses so I can operate and administer the introduction of products and services which my clientele may provide or like to provide to these businesses. To do this I seek and will try to then use:

(a) personal information about key individuals who may be a sole trader of his (her) business or who otherwise is a proprietor, director, company secretary, partner, committee member, trustee, controller, beneficial owner or other authorised person overseeing or appertaining to the relevant aspect of that particular business which I will have contacted.

(b) I may glean personal information on such key individuals for the purposes of operating and administering the introduction of products or services to any given business which I perform for my principals. Personal information on key individuals is obtained directly from the key individuals themselves; from colleagues within the business to which such an individual works or is linked; or from such an individual's dealings with me or any specific one of my clientele for whom I'm working.

7. My legal basis for using personal information

I do and will only use personal information where doing so is permitted by the laws which protect the individuals' privacy rights, respecting them whilst doing so. I only use personal information where:

- I have consent (if consent is needed or been granted) else on the basis of legitimate interest;
- I need to use the information to comply with my legal or contractual obligations;
- I or my clientele need to use the information to perform a contract with a business in which such an individual works;
- and / or it's fair to use the personal information either because it's in my legitimate interests or the legitimate interests of my clientele – and where there is no disadvantage to any particular data subject – this includes where it is in the legitimate interests of my clientele or me to contact a likely target prospect about products or services or otherwise for marketing purposes.

8. Sharing personal information with or getting personal information from others

8.1 Where acting as a data controller (ie in my own right, as a part of my own reasonable quest to look for more potential customers or clientele for me) – I do not share any of my own prospective customers' details with anyone. What I'm told or find out is not shared with anyone else.

8.2 Where acting as a data processor (ie where I'm working on behalf of my clientele) I certainly do need and absolutely will have to share the personal information I've gleaned or processed with my relevant clientele because doing so is necessary for whichever of my clienteles' behalf I'll have been working for in making contact to be able to make products and services available or otherwise market products and services. I only share personal information to the extent needed for those purposes. ie - where working for my "client A" I will only ever share the information I have / hold / have processed with "client A". Such information gleaned or processed when I'm working for "client A" would not under any circumstances be shared with or given to "client B", "client C" or any other client of mine or any other entity.

8.3 Although on occasion any one of my clientele may acquire new data for me to call or otherwise approach, generally, until I begin adding to it from what I find out through making initial phone calls or otherwise contacting the 'target customer companies', there is no personal data present.

8.4 Most of the time the personal information I come to have is information which will have been given to me, or has been gathered by me in the course of contacting prospective customer businesses as a forerunner or ongoing basis in providing products and services to the companies of the data subjects themselves; either by the individuals concerned or their colleagues.

8.5 On rare occasions, I may be given lists already populated with names / email addresses of people believed to be the right individuals to speak with at any given target company. When and where this is the case, I always take steps to check on the provenance and permissions of the data as best I can myself. I have never had an instance where I've found I have been given data which lacks appropriate consents / permissions – were I to discover such an aberration, I would stop using the personal data which that such entire dataset might contain and most likely proceed on the basis of deleting the errant data and treating what would be left as companies with no contact details (ie like the rest, how I generally get or am given data containing no personal information). I would also discuss at length with whomever gave me the data in question before making a decision as to whether a report would need to be made to the regulator (the ICO).

9. How long I keep or intend to keep personal information for

I do not retain personal information for any longer than is necessary for the purposes I need to use it for. As a rule of thumb, if and where I have been unable to speak with and (re)establish contact with someone after five separate successive attempts, I will assume that that individual is likely no longer in post and will then begin seeking the right person to speak with from scratch with the person answering the phone or where the phone is unanswered, by sending an email addressed to the 'job-title' at a 'catch all' email address (should there be one) rather than repeated to the person whose details will then be in the process of being removed. However, it may be that I am again given the self same name & email address of the person whose details I will have deleted on this 'more than 5 unsuccessful attempts' rule.

10. Security – how the personal data I possess is stored and how I protect it

I use a password protected network storage device which has regular (daily) backups made of it to password protected workstations. These are kept in my office / study at home (ie the place where I work). Only I have legitimate physical access to my computer hardware. I will add that aside of the very small amount of other people's personal information which I oversee (name, email address, job-title and similar as outlined supra), the IT equipment I have also holds all of my own personal data (my own stuff encompassing things like digital photographs, bank statements and all manner of my own other sensitive to varying degree personal stuff). My security and backup arrangements are as safe as I can reasonably make them and are proportionate to the risks of all the data held.

11. What I do: Initially making contact then keeping in touch

11.1 The whole nature of the job which I do is about "ice breaking". I undertake this by trying to make contact then keeping in touch with the right people who work at the businesses and other entities I will have approached with the intent of empowering those people to make a business decision (which hopefully will favour me and / or the specific business I am at that time working for). I always say who I am and give the name of the organisation I'm working for at that particular time. I never hide the fact that I'm making an introductory or reminder marketing call and I always ask whether I can keep / stay in touch and usually suggest ~3 months though some times ~6 weeks might be better as could ~6 months or a year or perhaps 18 months or longer. The important part of what I do is not aggravating a prospective customer by over contacting or otherwise doing something that such an individual or his (her) colleagues wouldn't expect or like. *The whole idea is to find people who will want to become buyers after all – and aggravating people is not conducive to that end.* If contact from me is not appropriate or no longer desired, where I am soberly told "it's not for us – please don't call again", I will note having been told that (or words to that effect) and stop calling by making an appropriate note on the relevant record in my CRM system. Such businesses shouldn't get any further contact from me.

11.2 My method of working has settled generally as making a phone call asking to speak to the right person (either initially or subsequently), then on speaking with the right person or if that person is unavailable, getting his (her) name and email address (if I've not been given it before), then sending a 'support email' one at a time. The support email has "today's date" (and changes daily to reflect 'today'), the name of the individual or job title of the person I have spoken with or hope to reach, along with the name and address of the business where they work followed by a description of what I or the firm on whose behalf I've called does. ie A phone call is made then followed by a support email, the next phone call is made followed by another support email. All the support emails I send identify me and the business which I am then working for and all of them have an opt out or plainly invited way of getting the contact from me stopped. If and where someone comes back to me asking for no further contact, I firstly mark any record in my CRM with no further contact before then acknowledging their communication by telling them that this has been done and that he (she) should hear no more from me with advice to let me know if they do.

11.3 I do not indulge in mass email campaigns. If and where I send an email to anyone it will be either in support of a single phone call I've made that day to that individual's workplace to either confirm contact or that I have tried to contact – or in lieu of a phone call where I'm unable to make a phone call (newly TPS barred numbers, for example). I only ever send 'support emails' one at a time in support of or in lieu of individual outbound marketing calls made singularly one at a time.

12. Updating this policy.

12.1 I intend to periodically review this documentation and will amend as needed or advised.

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GDPR Privacy Statement
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