

# Our approach to Data Governance

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How we achieve confidence  
in compliance



## How Do We Ensure Compliance within Our Products?

At Equiniti Data, we take our responsibilities under the Data Protection Act 1998 (DPA) and compliance with the Privacy and Electronic Communications Regulations 2003 (PECR) very seriously. We are members of the Direct Marketing Association (DMA), bound by their Code of Practice, and we are registered with the ICO (Information Commissioner's Office) as Data Controllers.

Stringent compliance and governance protocols are central to our business and differentiate us in a data-led economy. Our compliance focused approach guides both our product development and operating procedures - internally and externally.

We commit to the highest level of integrity in the gathering, handling, protection and application of consumer data, and we insist that both our clients and our contributors also observe compliant data management practices at all times.

### ISO Accreditation:

Our business is ISO 27001 certified, meaning that all business assets, such as data, are managed in a secure environment by all our employees. We are audited at least annually by the BSI in order to maintain this certification, demonstrating our commitment to the safeguarding of personal information. Our goal is to protect the confidentiality, integrity and availability of information assets and systems.

### Brexit and The European Data Protection Landscape:

The way we define personal data is evolving constantly with the intention to strengthen and unify data protection for individuals within the EU. Even after Brexit, we aim to maintain compliance with the new EU General Data Protection Regulation (GDPR) coming into operation on 25 May 2018 as well as compliance with UK data protection legislation.

Compliance is a necessity and without it businesses will be at risk of adverse publicity, fines and enforcement. Thanks to our dedicated Legal & Compliance team, we are ahead of the curve and have been compliant since day one. They monitor and adjust protocols in line with legislation or regulation whilst upholding our robust internal data protection, handling and information classification policies.

Equiniti Data sees compliance as an opportunity for us to stand apart, leveraging our quality products and services in a market place where others cannot compete.

# 7 steps to compliant data

- 1**

We rigorously audit data contributors before we enter into partnership with them. This includes understanding the data they contribute and how it is collected, as well as their policies and consents. This includes channel specific permissions, sectors named in FPNs and privacy policies. We regularly re-assess compliance against our strict criteria.
- 2**

We don't hold data for longer than is necessary and we have an auditable suppression process for individuals wishing to opt-out of our database. Unsubscribes and Subject Access Requests are dealt with courteously and efficiently by our Legal & Compliance team.
- 3**

We do not store or process any sensitive consumer data within our data products, such as health information or the racial or ethnic origin of individuals.
- 4**

We are committed to protecting the security of consumers' personal information. We are ISO 27001 certified and use a variety of robust security technologies and procedures to protect personal information from unauthorised access, use, or disclosure. Employees undertake data protection training when they join the business and this is refreshed for all employees at least annually.
- 5**

Our in-house Legal & Compliance team ensure that we comply with the 8 principles of the DPA and our processes are regularly reviewed in line with regulations. We have a proactive programme of preparation to be GDPR compliant by May 2018 which includes evolving our processes for responding to individuals' rights, data security and acquisition.
- 6**

Our data products are refreshed regularly - ensuring that our data is accurate and up-to-date. For example, over 1 billion records are processed into each EQ Reach build from numerous trusted contributor sources. Each record being scored at an individual attribute level, using confidence, recency and priority.
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Our Partnerships and Legal & Compliance teams work very closely to maintain our credentials in compliance, making sure that our data products stand apart in terms of quality.

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**ANGELA BRIDGES**  
Head of Legal & Compliance



Registered with the ICO





TALK TO US TO SEE HOW WE CAN HELP  
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