List User Compliance

Data Controller / Processor Questionnaire

Updated 27/09/2019

For the avoidance of doubt, a list user/mailer will be referred to as the Data Controller. A Bureau, mailing house, printer will be referred to as a Data Processor or Sub Processor. List brokers and agencies may also be considered as Processors.

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| **1** | **Your Company Information (Agency or List Manager)** |
| 1.1 | Company Name  Click here to enter text. |
| 1.2 | Company Address  Click here to enter text. |
| 1.3 | Company Registration Number  Click here to enter text. |
| 1.4 | Your Name  Click here to enter text. |
| 1.5 | Your Title  Click here to enter text. |
| 1.6 | Your Email  Click here to enter text. |
| 1.7 | Your Telephone Number  Click here to enter text. |
| 1.8 | Is your company a member of any professional or trade bodies? If yes please enter details.  Click here to enter text. |
| 1.9 | Please provide your ICO Registration number below.  Click here to enter text. |
| 1.10 | A Data Processor Agreement (DPA) needs to be in place between all Controllers and Processors. List managers/brokers may be considered as Processors and list owners/users are Controllers. Are you able to provide copies of a DPA between the Controller and Processor if required? Yes  No |

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| **2** | **List User - Data Controller Information** |
| 2.1 | Company Name  Click here to enter text. |
| 2.2 | Company Address  Click here to enter text. |
| 2.3 | Company Registration Number  Click here to enter text. |
| 2.4 | Brand/Trading name of advertiser  Click here to enter text. |
| 2.5 | Please provide you ICO registration number below  Click here to enter text. |
| 2.6 | Is your company a member of any professional or trade bodies? If yes please enter details.  Click here to enter text. |
| 2.7 | Specify the channels the data will be used for 3rd party marketing.  Postal  Email  SMS  Telephone |
| 2.8 | Will the data be transferred/stored outside of the UK/EU.Choose an item. |
| 2.9 | If yes to 2.8, where will the data be stored? Click here to enter text. |
| 2.10 | If yes to 2.8, what steps has the list user taken to ensure international privacy rules have been adhered to. Examples might include Privacy Shield, Binding Corporate Rules, third party country is deemed to have adequate data protection rules? Click here to enter text. |
| 2.11 | Has your company suffered information security related incidents over the past two years? If yes, please provide details of the breach, your response to the breach and measures you have taken to mitigate it happening again.  Click here to enter text. |
| **3** | **Data Processing Information** |
| 3.1 | How will the data provided be used?  Click here to enter text. |
| 3.2 | How long do you need to retain the data for?  Click here to enter a date. |
| 3.3 | What is the justification for retaining the data for this length of time?  Click here to enter text. |
| 3.4 | Have you made all processors/sub-processors that will handle data on your behalf aware of the data retention requirements? Choose an item.  Will you ensure all processors/sub-processors working on your behalf adhere to the data retention policies in place? Choose an item. |
| 3.5 | What processes are in place to ensure that data is not stored for longer than stated above and please confirm data will be destroyed/deleted once this period has been reached? Click here to enter text. |
| 3.6 | Please confirm if you or your processor will screen the data supplied against the following suppression services prior to mailing. Please note screening against MPS and any industry Deceased suppression file is a requirement of the DMA.  MPS Choose an item.  Baby MPS (if relevant) Choose an item.  TPS Choose an item.  Goneaways Choose an item.  Deceased (industry suppression file) Choose an item.  If other suppression services are used, please provide details below.  Click here to enter text. |
| 3.7 | When using 3rd party data, please describe your procedure for handling unsubscribe/no mail or Subject Access requests from customers/subscribers.  Click here to enter text. |
| 3.8 | Please provide your compliance officer details below.  Name Click here to enter text.  Telephone Click here to enter text.  Email Click here to enter text. |
| 3.9 | By what method do you use to transfer data between 1) you and Data Processors/Sub Processors 2) you and 3rd party companies? Click here to enter text. |

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| **4** | **GDPR/UK Data Protection Act 2018** |
| 4.1 | Please indicate below the legal grounds for processing you are using under GDPR/UK Data Protection Act 2018  Choose an item. |
| 4.2 | If using Legitimate Interest, could you provide a copy of your Legitimate Interest Assessment if requested? YES  NO |
| 4.3 | Please provide us with examples of your opt-in/opt-out statements in the form of a screen grab, pdf of a coupon from a catalogue or off the page advertisement. Please provide a sample from each data collection point if more than one. |
| 4.4 | Do your data capture points (order forms, order line, online forms) clearly highlight your Privacy Policy/Data Protection statements? Please provide a link to your privacy policy.  Click here to enter text. |
| 4.5 | When using 3rd party postal data, how do you check to ensure that it has been collected in accordance with the Data Protection Act 2018?  Click here to enter text. |

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| **5** | **Processors and Sub Processors** |
| 5.1 | Will the List User pass the data or provide instruction for the data to be passed to processors or sub processors for processing. Choose an item. |
| 5.2 | If Yes, please provide their details below. (Company name and address)   1. Choose an item. Enter details here Click here to enter text. 2. Choose an item. Enter details here Click here to enter text. 3. Choose an item. Enter details here Click here to enter text. 4. Choose an item. Enter details here Click here to enter text. |
| 5.3 | Does the List User have in place Data Processing Contracts with Processors and Sub Processors? Choose an item. |

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| **6** | **Authorised Signatory** |
| 6.0 | Sign Here \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Name Click here to enter text.  Position \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Date 06/02/2019 |

If there are any changes in the way that you process 3rd party data, we ask you inform us as soon as practically possible.