

# Choose Leads Privacy Policy



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## Overview:

Choose Leads Limited (“Choose Leads” or “we”) Company registration 8241795. Registered in England and Wales with registered office of Choose Leads Ltd, 7 Bell Yard, London, WC2A 2JR.

Choose Leads is registered with the ICO Office (Information Commissioner’s Office) in the United Kingdom with registration ZA031580. We seek to fully comply with the General Data Protection Regulation (“GDPR”) 2018 and the Data Protection Act 2018.

Under the definitions of the GDPR Choose Leads is a data processor.

Choose Leads is a marketing agency; we process consumer data for the purpose of direct marketing campaigns and acting on behalf of marketing companies for processing data for their outbound telemarketing teams. We are committed to protecting and keeping any personal data received secure.

All the below information will be available at any point to be viewed by clients regarding the sources we procure from for their campaigns.

Before working with a Data Source, Choose Leads will always

- a) Make comprehensive quality checks on the data collection source to ensure the data is fairly and unambiguously collected.
- b) Ensure the supplier source has completed and passed the Due Diligence required by Choose Leads prior to orders being placed.
- c) Complete a GDPR Risk Assessment of the individual data collection points ensuring the data is – Freely given, Specific and Informed. The consumer must also have the ‘Right to be forgotten’ with the opt in being a ‘positive’ action.

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## Reason for processing

Choose Leads is a marketing agency company and processes personal data to:

- Enable the business to fulfil its function of supplying lists to its clients for use in their outbound direct marketing activities or maintain an existing relationship they may have.
- Process consumer data between data controllers to perform a contract.
- To contact you when you use our online enquiry form.

Under the GDPR there are six identified reasons for processing. Choose Leads processes data which falls under the following two categories:

- a) “Legitimate Interest” – The consumer has either: carried out a positive action to agree to marketing by a specific channel of communication (telephone, email, SMS, postal) and has a sector specific list of whom may carry out further communication with them within the privacy policy/Sectors/Sponsors list (or) The data collector has a legitimate interest in trading their data and confirms this within the privacy policy. Telemarketing as a channel is opt out, therefore we would ensure that the data is TPS checked when processing under legitimate interest.

- b) “Explicit Consent” – The consumer has opted into a specific channel of communication (telephone, email, SMS, postal) in a positive manner. At the point of opting in the consumer will have been given the specific company brand who will be calling them. If this is a daily lead Choose Leads will not need to TPS screen the data.

\*\*\* Choose Leads would recommend that its clients also TPS cleanse the data prior to dialling to safeguard in case there are any software issues with the Choose Leads system. This would be a very rare occurrence but would be beneficial for the centre itself to always TPS cleanse in addition to this.

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## Auditing:

When working with a source Choose Leads will complete the following:

1. Run monthly checks on each source of data:
2. The GDPR Compliance /Auditing Executive assesses each source of data with Choose Leads in-house auditing system.
3. Each month’s consumer records for the previous month’s activity. Choose Leads will listen, and Audit 5 calls/Online opt ins per supplier ordered per month for each client.
4. A report regarding the findings will be produced for the data sources, and for the clients.
5. Each source is given a score for compliance – small deductions in scores will be given for ‘call recordings not being clear’ for example. Large deductions will be made for more detrimental errors.
6. If the audit score for the source falls below an agreed acceptable level the source will get a first warning. After the first warning, if a marked improvement is not seen a final warning will be given – within a week a further audit will be conducted at which point if the issue is still apparent the source will be ‘Paused’. The source would need to demonstrate they have rectified the issue before being allowed to resupply.

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## Trust

### About us

Choose Leads ensure that all its suppliers are compliant and respect the GDPR and ICO guidelines when collecting data whether online or through telephone surveys. Checks are carried out monthly to further safeguard the standards are being maintained. The clients/marketing agencies that purchase the data are all registered with the ICO.

On receiving complaints, we are respectful to the consumer, record their details and assure them that we will trace the supplier of the data and request its removal with immediate effect. We also advise the consumer to go on line to [www.tpsonline.org.uk](http://www.tpsonline.org.uk) and register their telephone details with the Telephone Preference Service to place a stop to future unwanted marketing calls.

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## Openness

### What the law says and what it means for Choose Leads

The law requires us to be open about what personal data we process, and what we do with it. Choose Leads processes data on behalf of clients for either explicit consent or a legitimate reason for processing.

### Consumer data and what we do with it

Choose Leads is a Data Marketing Agency.

Organisations must have a reason to process personal data. Choose Lead's primary reasons for processing the collected consumer data is to perform a contract, under explicit consent or for legitimate interest.

### What personal data do Choose Leads process?

Choose Leads will collect personal data when you contact us using our online enquiry form. We will collect your name, your email address, telephone number and other additional information you provide. We use this data to respond/resolve your query under your consent. We will not share this data with third parties or use it for marketing purposes.

By law, the data Choose Leads processes on behalf of its clients must be limited to what is necessary and relevant to their purpose. The information collected is (including but not exclusively):

- a) Name
- b) Postal address(es)
- c) Telephone number(s)
- d) Other contact details such as an email address
- e) Any specific information given about age and gender.
- f) Selected information regarding any positive variables for a specific question answered. I.E Utility provider, telecoms provider, life insurance policy provider – these will vary depending on the marketing survey answered.
- g) The details of any complaint you make
- h) Records of correspondence if you contact us
- i) Where we've sent letters and they are returned to us, as the addressee no longer lives there
- j) IP addresses linked to cookies

Those clients who may wish to send marketing communications may fall into the following categories:

- Charities, Competitions, Energy, Financial products, Funeral plans, Lotteries, Health, Home improvement, Insurances (Life, Home, Pet, Travel, Other), Legal, Lifestyle, Pension review, Retail, Telecoms, Travel, Utility, Warranty.

Data subjects have a choice about whether to take part in online surveys, details are given on how to opt out during all survey calls, online collected data is also clear and transparent, giving details of where to opt out.

### Special categories and sensitive personal data

Data protection law treats certain types of personal data as sensitive (called 'special categories data' within the law) and has further rules about how it is used. This includes information about racial or ethnic origins, political or other views, sexual orientation and health. The suppliers of data to Choose Leads are also covered by this law.

Choose Leads does not process any special category data.

### What do we do with the information that has been collected?

The information collected by suppliers and processed by Choose Leads is used for marketing purposes by its clients to offer the consumer a better product, it is entirely the consumers right to refuse the call and ask for their details to be removed from the caller's data base and for any further information about the source of the data subject's details.

### How long do we keep personal data?

By law, personal data must not be kept any longer than necessary for the purpose of marketing.

Choose Leads retains certain types of personal data in case it needs to be referred to later for compliance purposes or are requested for legal reasons to share the data with authorised persons.

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## Security

### What the law says, and what it means for Choose Leads and the data processed

Data protection law instructs us to take all appropriate measures to keep personal data secure. This means we must take steps to protect data against unauthorised or unlawful use, and against accidental loss, destruction or damage.

### Will personal data be kept secure?

Personal data is personal, and should stay safe, and private. We know this is crucial in maintaining trust in Choose Leads. Personal data is protected in many ways. These include staff training, investing in technology and following strict handling and storage procedures.

The personal data collected is limited to information that is relevant and necessary. The appropriate steps are taken to keep data secure. We always follow data protection law and aim to apply best practice for information security.

Our technology and information security systems are there to protect personal data. We apply up to date data encryption tools and have specific policies in place, with dedicated staff training materials and contracts to ensure personal data is fully protected. This aims to prevent data being lost, damaged or destroyed, or its unauthorised or unlawful use.

Data is stored for no longer than necessary in suppression files for compliance purposes.

An email is not always secure. Unless a password protects or encrypts it, someone else could read it. If you wish to email us, in addition to your enquiry, you should only send enough personal information to allow us to identify you, for example your name and telephone number. Please send to [compliance@chooseleads.co.uk](mailto:compliance@chooseleads.co.uk).

### Will data be moved outside the European Economic Area?

Most of the personal data is handled and stored within the UK, Channel Islands and the Isle of Man. Some is processed outside the European Economic Area (EEA).

Choose Leads only allow data to be transferred when we are completely satisfied that the data is secure. Our suppliers are contractually obliged to incorporate technical, organisational and auditable measures into their own processes, to ensure any data is transferred safely.

## Cookies

Cookies are small data files used by websites to increase effectiveness. We use cookies to increase your security and help improve our site by recognising returning visitors to help us deliver a more personalised service to our users. Cookies can be necessary for the operation of some parts of the site.

Most browsers accept cookies automatically, however, this can be disabled by activating the setting on your browser to reject cookies.

An IP address and information will also be collected if a submission is made on any of our contact forms.

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## Fairness and rights

### What the law says and what it means for Choose Leads and the data processed

Data protection law gives clear rights relating to personal data and gives us clear rules about using it. The law says we must use data lawfully, fairly and transparently. This means explaining how we use consumer data, who we share it with, and informing data subjects about what data we hold, if requested the data records can also be deleted.

### How to find out what personal data Choose Leads holds

Data subjects have the right to know what information we hold. This is known as a Subject Access Request (under GDPR this is known as the right of access).

We don't charge for the first request, but we may charge a reasonable fee if the request is repetitive or unreasonable. A request for information under data protection law should be responded to within one month.

### Data subject rights

Data protection laws provides the right to object to Marketing Calls.

**The right to erase data from our systems – please email [Compliance@chooseleads.co.uk](mailto:Compliance@chooseleads.co.uk) and confirm the phone number you have been contacted on and request for this number to be opted out.**

In all circumstances, data subjects can ask us to remove personal data to ensure to ensure there is no further marketing from Choose Leads clients and for contacts details of the originating data controller.

If you ever feel your complaint has not been dealt by Choose Leads to your satisfaction, you also have the right to complain to a relevant supervisory. More information about the Information Commissioner's Office (ICO) can be found at [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns).

### The right to object to processing

You can object to Choose Leads processing your personal data.

As outlined in the GDPR your full rights in respect of your personal data are:

- The right to be informed

- The right to access
- The right to rectification
- The right to erasure
- The right to restrict processing
- The right to data portability
- The right to object
- Rights in relation to automated decision making and profiling

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## Accuracy

### What the law says, and what it means for Choose Leads and the data processed

Personal data must be kept accurate and up to date, with every reasonable step taken to ensure that inaccuracies are removed or rectified. This means that if a mistake or an error is discovered, Choose Leads will put it right.

### How accurate is the data held on our systems?

We will take all appropriate measures to make sure our records are correct. A data subject can ask us to update any personal data if it's wrong, out of date, or incomplete.

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## How to opt out

If you have received marketing calls and would like to stop these please email

[Compliance@chooseleads.co.uk](mailto:Compliance@chooseleads.co.uk). A member of the compliance team will then investigate which data collection source has supplied your data for marketing. Choose Leads will then contact the source and get them to remove you from further marketing calls/being passed to any other organisations.

Choose Leads will also add you to our internal 'Do Not Call' list (DNC).

Right to be forgotten: As a data subject you do have the right to be forgotten – again if you wish to exercise this right please email [compliance@chooseleads.co.uk](mailto:compliance@chooseleads.co.uk) with the number you have been contacted on. This does mean that Choose Leads would not keep any trace of your record, therefore if the record was processed again by Choose Leads there would be no way of screening this data not being passed to another client for marketing calls.

If you have completed your information on multiple sites, although Choose Leads will request you are opted out from the source where Choose Leads has acquired the data from there is no guarantee that other sources of data collection may be using your data.

A majority of the data procured by Choose Leads for its clients comes from either 'online competition sites', 'telephone surveys', 'face 2 face surveys' or 'paper surveys'.

If you wish to take a survey of any type, please make sure you do not tick any of the boxes regarding getting calls from any 'sponsors/partners/named companies' as this means you have opted in for these companies to contact you.

Choose Leads would recommend that you go to [www.tpsonline.org.uk](http://www.tpsonline.org.uk) and register on the government run site – this is the Telephone Preference Service. Choose Leads always screen any data against the Telephone Preference Service (apart from where Explicit Consent has been given. Please note even though it may

appear that you are on the TPS register as soon as you have added your number online, it may take up to 28 days to take effect.)

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### Changes to this policy

Choose Leads may amend this policy if the way we process data, or the law relating to this, changes.

This Policy was last updated 24<sup>th</sup> March 2025.