

SSLP Group Ltd will, from time to time, carry out research based on target companies within a desired market, to identify and contact the person responsible for the production/management of payroll and payslips, HR or the budget holder for epayslips/eportal; the individual who is then addressed with a targeted and specific email or telephone call to gauge interest or need for the solution.

Contact data contains details including first name, last name and email address.

This aspect of the marketing data gathered constitutes the processing of personal data and therefore, is required to be compliant with GDPR. Business related data is not applicable under GDPR - which has the intention of protecting personal data. This target company research uses publicly available resources such as LinkedIn, Companies House, search engines, Website monitoring tool and teleresearch to identify the target company. The data made available through research will only relate to decision makers for a specific solution at the organisation. Targets are selected for this type of activity based on the similarity to existing customers regarding market sector or job role. In this regard it is anticipated that this data will be leveraged by the SSLP Group Ltd Sales & Marketing Team under the lawful basis for processing of 'Legitimate Interests'.

SSLP Group Ltd will select the most appropriate point of contact from the data gathered, to convey a highly relevant, targeted message either by email, telephone or by post to the business address and to the point of contact. Any correspondence will be based upon their likely interest in the organisation's product or service.

Under GDPR, SSLP Group Ltd will only ever process necessary personal data, which is limited to first name, last name, telephone number (if direct) and email address. SSLP Group Ltd will process further business-related data such as business website, position in decision making process, business name, business address, job function and business telephone numbers. No sensitive personal data will be collected or processed in any way.

Six Lawful Basis for Processing Personal Data Under the EU General Data Protection Regulation (GDPR)

There are six, lawful basis for processing personal data. These are detailed as follows:

- Consent - the individual has given clear consent for you to process their personal data for a specific purpose
- Contract - the processing is necessary for a contract you have with the individual, or because they have asked you to take specific steps before entering into a contract

- **Legal Obligation** The processing is necessary for you to comply with the law (not including contractual obligations)
- **Vital Interests** The processing is necessary to protect someone's life
- **Public Task** - the processing is necessary for you to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law
- **Legitimate Interests** - the processing is necessary for your legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual's personal data which overrides those legitimate interests. (This cannot apply if you are a public authority processing data to perform your official tasks.)

Source: ico.org.uk, February 2018.

The information relating to the six, lawful basis for processing personal data is taken from the ICO website and the GDPR regulation documentation. Further information regarding the lawful basis for processing personal data can be found at ico.org.uk

Data Privacy Impact Assessment

SSLP Group Ltd has carried out a DPIA. Based upon that assessment it is deemed that the rights and freedoms of the data subjects would not be overridden in our processing of the personal data and that in no way would a data subject be caused harm by the SSLP Group Ltd processing. Based upon our segmentation by organisation and by specific job function, coupled with our processing of personal data within the context of a business environment, it is deemed that any processing of data will be limited to business matters, and therefore any risk of personal compromise is extremely unlikely. It is also deemed that direct marketing and sales is necessary in the context of the development of the business to generate business sales. We can confirm:

- We have checked that legitimate interests is the most appropriate basis for processing prospect data
- We understand our responsibility to protect the individual's interests
- We have conducted a DPIA and kept a record of it, to ensure that we can justify our decision
- We have identified the relevant legitimate interests
- We have checked that the processing is necessary and there is no less intrusive way to achieve the same result
- We only use individuals' data in ways they would reasonably expect

- We are not using people's data in ways they would find intrusive or which could cause them harm
- We do not process the data of children
- We have considered safeguards to reduce the impact where possible
- We will always ensure there is an opt-out/ability to object
- We keep our DPIA under review every six months, and will repeat it if circumstances change
- We include information about our data processing activities on the public facing website.

How we Procure Data

We procure data in a variety of ways, collected in line with the lawful basis of 'Legitimate Interests'. The following are ways in which we collect and process data:

Business Data

Although business data is not relevant under GDPR, SSLP Group Ltd is committed to providing a transparent process. SSLP Group Ltd collects business data via the following methods:

Primary research – Our in-house Sales Team gather data relating to business from publicly available information, using search engines and other online tools to research global businesses. We also use the services of a website monitoring tool in providing us with website visitor information.

Secondary research – SSLP Group Ltd has a UK based Sales and Marketing Team who use existing publicly available sources of data to enhance the business data. SSLP Group Ltd also use publicly available tools like Linked In to provide the relevant contact information for the organisation and may carry out teleresearch to complete and clarify the details. Personal contact information is limited to name, direct telephone number, email address.

How we Ensure Data Validity and Recency

SSLP Group Ltd has a UK based in-house Sales & marketing Team who are responsible for ensuring the validity and currency of the data contained within the CRM system. Any records that are found to have no further use in the sales process are marked Do Not Solicit and excluded from marketing activity. We also contact the company on an adhoc basis to establish whether the person is still in that position and the solution is still under consideration.

SSLP Group prefers to hold the data to ensure that any new source of matching data is merged with the old and the company/contact/status details updated.

This allows us to view previous contact notes when speaking to them about the new opportunity. Predominantly, if the opportunity is dead, this type of record is used for Nixie processing only.

Data Storage and Retention

The data held within the CRM tool and is processed and stored in the UK within a secure environment that is access controlled.

Request to Object

Any individual who is held within the Capsule system has the right to object to future marketing. Any current client has the right to object to marketing or sales messages about other products and services. The method to do this is contained within the email, EULA, letter and/or website Privacy Policy. They can also opt out during the telephone contact we have with them. All requests will be processed within 30 days. Details will be added to a suppression (Nixie) file to ensure that the details cannot be processed by SSLP Group Ltd in future. Please note that this applies only to the processing of personally identifiable data, not that of the business data which does not fall under the remit of GDPR.

Request for Deletion

It is important to understand the difference between a right to object and a request for deletion. If the contact requests deletion, we will remove any data we hold about them from the CRM. This will also mean that we will remove them from our suppression files. If they are removed from our suppression files, there is a risk that their data may be processed again in the future if their details are re-added to our software by our Sales & Marketing Team. If the data subject does not wish for SSLP Group Ltd to process their personal data in the future, we would recommend they request to object rather than request to be deleted as this will ensure that their details are always suppressed from processing. The option however is theirs, and in either case we will process their request within 30 days. Please make your request in writing by emailing: dpo@sslpost.com

Request for Data Held

The data subject may request that we send them all of the data we hold that relates to them. In this case, requests must be sent in writing via email to dpo@sslpost.com. We will process and respond to their request within one month; this service will be free of charge from 25th May 2018 providing the information requested is not deemed "manifestly unfounded or excessive".