

## **Who are we?**

Consumer world is the brand name for Civanta Technology Solutions Pvt. Ltd, registered in India. It's offices can be located at 96, Udyog Vihar phase1, Gururgam, India. Our UK ICO registration number is ZA518352.

We operate as a BPO services company and conduct telephone surveys for direct marketing purposes on behalf of some of the UK's leading companies. We work with many of the UK's leading brands helping them to better share information about their products and services that may benefit you. Civanta Technology Solutions Pvt Ltd provides its client partners with your personal information so you can hear from them about different money saving offers and other relevant goods or services. This is delivered with your consent or through legitimate interests. See below for an outline of what each of these means for us and you.

Civanta Technology Solutions Pvt Ltd, is committed to maintaining the privacy and security of personal information we hold on you. This Privacy Policy Statement contains information about our policies regarding the collection and use of your personal data through our telephone surveys.

## **UK Data Protection Law:**

**Data Protection Act 2018 and the Privacy and Electronic Communications (EC Directive) Regulations 2003** as well as **the EU GDPR regulations** that has come into the effect from 25th May 2018.

## **How Do We Use Your Personal Information?**

We may from time to time share your information with named sponsors or third-party companies for direct marketing purposes.

Such information will be provided as a direct result of completing our telephone survey. The questions we ask you will be on behalf of named companies or sponsors who will only contact you if you give **consent to do so** or if we share your contact details with third-party companies under legitimate interests. Where this is the case, we have conducted a LIA (Legitimate Impact Assessment). An example of this is where you've shown an active interest in saving money on your energy bills and we may share your details with energy companies to see if they can help you save money on your monthly bills.

Be assured that any such parties will only be allowed to use your data in accordance with The General Data Protection Regulation (GDPR 2018) and other applicable law relating to privacy. If you don't want to share your details, you can ask us to stop at any time now or in the future. Further information about how to do this can be found within our privacy policy.

## **What Information Do We Collect?**

We collect personal information about you that includes your name and contact information that you volunteer such as your mobile number, telephone number, or postal address. In order to provide you with the most relevant offers, we may need to collect your date of birth as well as information about your preferences, likes and dislikes. We never collect credit card details, bank account number and any other sensitive information like medical history, political or religious beliefs, this is known as 'Special Category' data.

We monitor and record your calls or other communications and do so in accordance with data protection legislation and other applicable laws. Monitoring or call recordings will always be held for business purposes, such as for quality control, training and compliance reasons.

We will periodically review your personal information to ensure that we do not keep it for longer than is permitted by law or at the point you request we remove all details and information held by us on you.

## **Where is your personal information held?**

The Personal information we collect is stored securely. We use different network security technologies to help protect the information from any unauthorized access, use, or disclosure. The information will be accessible by only a limited people who have been authorized to do so inside our organisation, and also, we have established procedures to cope with the events that happen and those are beyond our control.

## **How do we collect your personal information?**

We collect Personal Information about you in several ways including the following:

- When you complete one of our lifestyle questionnaires or surveys;
- When you complete our unsubscribe form;
- When we purchase or license your information from other data controllers;

When you are entering Personal Information onto our website it is not until you click the submit button that your personal information is transferred to us. Unfortunately, the internet is not a 100% secure medium and we cannot guarantee or accept any liability for any loss or damages in relation to information that you submit that is lost in transit. We also purchase and license personal information from other third parties. We call these third parties Data Contributors. Your Personal Information may be collected by Data Contributors if you have submitted information to a website, (for example when entering a prize draw), completed a telephone survey or lifestyle questionnaire or when buying goods and services from third parties. Regardless of the way your personal information is collected, our data contributors warrant to us that you have consented to your personal information being shared with us and that the permission is current and meets the required regulatory standards. We only ever work with data contributors that operate within UK Data Protection Law and are registered with the ICO at the time of purchase. You have the right under UK Data Protection Law to Opt-Out of receiving direct marketing from us or our partners at any time and more information is shown about how to do this in our privacy notice.

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## **Legal Basis for processing your personal information - Legitimate Interests**

Under legitimate interests, we are also permitted to share some information with third parties who use such data for non-marketing purposes (including credit and risk assessment and management, identification and fraud prevention, debt collection and returning assets to you). This would include the data you provide to us today, at any time in the past and in the future. We use this lawful basis to conduct our telephone surveys or where previous consent to a call from Consumer World has been captured.

## **Who Do We Share Your Information With?**

Your data may be shared and combined with other companies who hold your personal data, and we may use information from other sources to add to data we already hold. This information may help us to improve our ability to service your needs on a personalized basis, by helping us to learn more about you and your purchasing habits and allowing us to let you know about offers you might be interested in.

Your data may be used for data validation, enhancement, information verification, suppression, tracing and to the extent permitted by law, individual reference or lookup services, by Consumer World and 3rd parties.

Please remember that you can opt-out at any time (see our opt-out process below). Furthermore you can request the suppression of your details from Consumer World's database if you would prefer us not to use your information for any of the above.

You can also request to know what personal information Consumer World holds about you, by writing in person to us at the address below asking for a subject access request.

## **Where we process your information**

We may process your information outside the UK or European Union. Where this is the case, we will not transfer your information to other countries outside the EEA unless it is unavoidable to allow us to deliver our products and services. If we do, we take care to ensure the same level of privacy and security as the UK.

## **Marketing Services Providers**

Marketing Service Providers are companies who collect data from Data Controllers, such as ourselves, and help their clients tailor products and services which best suit your needs. They may also use your data for fraud prevention. The Marketing Services Providers we work with are strictly limited to only those organisations we have completed checks on and who will process your data in strict compliance with all laws, regulations and guidance with regard to Data Protection. We will share your data under strict licence terms with the Marketing Services Providers listed below, who like us, will use it to create products and services to help organisations better understand the likely characteristics of their customers; communicate with them more effectively; and find others like them across a range of marketing channels.

### **Our Marketing Service Providers include:**

Aura Media Group Limited

<https://www.auramedia.co.uk/privacy-policy>

## **Business Sectors**

Companies who may wish to communicate with you could fall into the following categories:

<b>Sectors</b>	<b>Description and examples</b>
Retail	<ul style="list-style-type: none"><li>• Online retail</li><li>• General stores</li><li>• Automotive (including sales, accessories, rentals or repairs)</li><li>• Property</li><li>• Home furnishings</li><li>• Home improvement</li><li>• Fashion and clothing</li><li>• Telecoms and Utilities</li><li>• Mail Order</li></ul>
Finance	<ul style="list-style-type: none"><li>• Pensions</li><li>• Loans, credit cards and mortgages</li><li>• Investments &amp; savings</li><li>• Wills</li><li>• Funeral Planning</li></ul>
Insurance	<ul style="list-style-type: none"><li>• Home</li><li>• Car</li><li>• Travel</li><li>• Pet</li><li>• Personal</li><li>• Other insurances</li></ul>
Travel	<ul style="list-style-type: none"><li>• Holidays</li><li>• Hotel</li><li>• Airlines</li><li>• Travel booking</li></ul>
Lifestyle	<ul style="list-style-type: none"><li>• Health &amp; Well-being (including mobility)</li><li>• Fitness</li><li>• Charities</li><li>• Media &amp; publishing companies</li><li>• Leisure</li><li>• Gaming</li><li>• Legal Services</li><li>• Educational institutions</li><li>• Market Research</li></ul>

## **Your Personal Rights**

You have the right to object to this processing at any time by contacting us at [info@consumerworld.co.uk](mailto:info@consumerworld.co.uk) or [compliance@consumerworld.co.uk](mailto:compliance@consumerworld.co.uk)

Where permitted by data protection and privacy law, we may disclose information about you (including electronic such as IP addresses) and/or access your information:

- If required or permitted to do so by law.

- If required to do so by any court, the Ministry of Justice, the Competition and Markets Authority or any other applicable regulatory, compliance, Governmental or law enforcement agency,
- If necessary in connection with legal proceedings or potential legal proceedings, and/or
- In connection with the sale or potential sale of all or part of our business.
- If we reasonably believe false or inaccurate information has been provided and fraud is suspected, details may be passed to fraud prevention agencies to prevent fraud and money laundering.

### **How Long Will We Retain Your Information For?**

The Act does not set out any specific minimum or maximum periods for retaining personal data. However, we will keep the personal data as long as it is necessary or as long as you want us to keep.

If you require further information on our data retention policies, please email: [info@consumerworld.co.uk](mailto:info@consumerworld.co.uk) or [compliance@consumerworld.co.uk](mailto:compliance@consumerworld.co.uk) or call us on 01213680703.

### **Your right to withdraw**

We respect your rights to your personal data. The GDPR provides the following rights for individuals:

- The right to be informed
- The right of 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.

If you do not wish Civanta Technology Solutions Pvt Ltd, to use your personal data for direct marketing of goods and services, you have the right to withdraw your permission at any time and can unsubscribe in writing either by email to [info@consumerworld.co.uk](mailto:info@consumerworld.co.uk) or by calling us directly at 01213680703.

### **How you can contact us?**

If you have any questions or comments about this Privacy Policy, wish to exercise your information Rights in connection with the personal data you have shared with us or wish to complain, please

#### **Contact us at:**

Compliance Department.  
Civanta Technology Solutions Pvt Ltd,  
96. Udyog Vihar Phase 1  
Gurugram,  
India

Or via emails at [compliance@consumerworld.co.uk](mailto:compliance@consumerworld.co.uk) or [info@consumerworld.co.uk](mailto:info@consumerworld.co.uk) or by calling us directly at 01213680703.

#### **Our EU representative is;**

Lionwave Solutions Limited (Company Registration 11577467), 71-75 Shelton Street, Covent Garden, London, England, WC2H 9JQ. ICO number ZA518200\_ - -

If you have any questions, comments or concerns arising from the website, the privacy policy or any other relevant terms and conditions, policies and notices or the way in which we are handling your personal information please contact us.

Civanta Technology Solutions Pvt Ltd, reserves the right to change this Privacy Policy from time to time and without notice. An up to date version of this Privacy Policy is available on the consumer world website.