

Who are we?

We are Dynaxon IT Services Private Limited, a data controller. Consumer First UK is a trading name of Dynaxon IT Services Limited, **UK with registered company number 11346830** and **ICO registration No ZA362557** and registered company address at **160, Kemp House, City Road, London EC1V 2NX** and is a subsidiary company of Dynaxon IT Services Private Limited, India with registered company number **U74900WB2013PTC191774** and registered company address at **B/38 Katju Nagar, Kolkata, West Bengal, India, 700032** from where the data is collected via telephone and digital media and processed to the UK.

We operate under the brand name **Consumer First UK, Select Lifestyle, Choicecore, Consumer Space, Consumer Benefits, UK Survey Group, UK Preference and UK Lifestyle**. Consumer First UK and our marketing sponsors will contact you with money saving offers and to update your preferences. You are never obliged to take part and can opt-out at any time. To do so

visit www.consumerfirstuk.com. When we call you, we will always display this telephone number to help you identify us. You are always able to call this number back to stop any future calls if that is your wish. Our office is at 160, Kemp House, City Road, London EC1V 2NX and you can contact us by email helpdesk@consumerfirstuk.com OR call **02033181047** with your questions. Again, to opt out of future calls from us, you can email us at helpdesk@consumerfirstuk.com OR call **02033181047**

What do we use your data for?

All of the data we collect from you is for direct marketing purposes. This means we share your details with reputable companies who may want to contact you by telephone to offer you goods and services that may be of benefit to you. You can ask us to stop sharing your details at any time now or in the future. Our brands Consumer First UK may also contact you by email, SMS or telephone to ask you questions for marketing purposes. These questions will be on behalf of companies who we will name at the time of the call and who will only contact you if consent is provided. Again, you can ask Consumer First UK to stop contacting you now or at any time in the future. You can email us at helpdesk@consumerfirstuk.com OR call 02033181047.

Consent and Legitimate Interests

Your data must be processed by us using one of the valid legal bases defined by the Regulations. The two we use are;

Consent

In short this is where you consent to a specific organisation, to contact you by a communication channel or channels which you have agreed to, for specific reasons, which in the context of our processing will be for marketing purposes. You can of course withdraw your consent at any time And we will describe how later on in the policy.

Legitimate Interest

Data may be processed in pursuance of legitimate interests. This includes using your data for postal and telephone marketing for ourselves or other but in either case communications will be

in relation to products or services which we believe may be of interest to you based upon information which you have provided us. As with all of your data you can also object to us processing your data in this way.

What types of personal data do we collect and share?

The information we collect includes your name and contact information that you volunteer such as your telephone number, email address, mobile number and postal address. We may also ask you for your date of birth and during the course of our surveys details about your preferences likes and dislikes. We will never collect information about your bank account or credit card details and nor will we collect any 'special category' data such as your medical history, religious or political beliefs.

How do we intend to use your personal data?

We and third-party organisations intend to use your personal data to provide a service you may have requested and for the purpose of marketing communications. We may contact you for reasons relating to the service you have request. Where you have provided consent for us to do so we may share your contact details with named client partners industry sectors such as Consumer durables, Lifestyle and Banking, Marketing, Financial and Insurance industries.

If you are interested in working for us, we will only use your personal data to process your application, monitor recruitment and provide statistics. Personal data about unsuccessful candidates will be retained for six months after the recruitment process is completed, at which point it will be disposed of securely.

We would only use your personal data fairly and in lawful manner. We would not share or disclose your personal data to any organizations and / or persons without your explicit consent, approval and / or authorization in writing. We would never retain or store your data in an unsecured manner and beyond its legal and business use. All data beyond its justified period of retention is disposed in a secured manner. We may go ahead and share your information with: :

- A. Our Group of Companies and Brands
- B. Groups of recipients within the specific industry sectors listed
- C. Other Data Controllers and Marketing Services Providers.

A. Our Group Companies and brands;

Dynaxon IT Services Private Limited

Dynaxon IT Services Limited

Consumer First UK

Consumer Benefits

Choicecore

Select Lifestyle

Consumer Space

UK Survey Group

UK Preference

UK Lifestyle

B. Groups of recipients within specific industry sectors listed below;

Claims Management organizations (Mis-sold PPI, Packaged Bank Accounts, Investments, Credit Card/Bank Charges, Mortgages and Pensions). We only work with organizations authorized by the Claims Management Regulator, including We Fight Any Claim. For more information see claimsregulation.gov.uk. Other industry types you can expect your data to be supplied to are: Automotive, Breakdown and Repair Services, Charity, Gaming, Leisure, Financial Products, Insurance, Health/Mobility, Home Improvements, Home Services, Wills, Funeral Plan, The We Plan Group, Claims Management, Pension Review, Mail Order, Market Research, Media, Retail, Telecoms, Travel, Telecommunication, Broadcaster, TV, Utilities, Estate Planning, Energy and Broadband. From time to time we also supply data to these sectors via agencies/brokers including Matters Family; we ensure that these agencies/brokers are reputable firms.

Please find a list of companies that Dynaxon currently or intends to work with:

Each of these companies will be a data processor or defined below as Marketing Service Providers:

Virgin Media, Ross & Richardson Ltd, CreditFix, EC Outsourcing Ltd, Energy Compare Ltd, 3Dotz Limited, Total Mortgage Solutions Limited, NHC Holdings LTD and Niagara Therapy, Switch Your Provider, Cloud Cover, Warranty Wizard, Life Expert, Appliance Secured, Comfomatic, Insure Us, Switch Experts, The Advisory Network, AMVOC ONE FAMILY, Sure Cover Group, Utilita Telesales Limited, Consumer Choices, Liquid Opulence, Home Logic, The Lead People Ltd, One Life Funeral Planning, One Life, My Health Protected, Contact Labs Group Limited, Secure Home Repair, Tech Essence Limited, The Lottery Centre, Independent Age- Angel TS, LJP Financial, Your Review, Repair and Assure, ME Expert Limited, Fuladvice, UK Debt Advisor, Homeshield Direct Ltd, Centrica, OVO Energy, Zest, Genesis, Sky UK Limited, SO Energy, Tails.com, EDF Energy Limited, Shell Energy Limited, Utility Warehouse Limited, Complete Review, Stay Covered, Giganet Broadband, V4 Consumer, Interactive Results LTD, Tomato Energy LTD, British Seniors, Scottish Power Energy Limited (<https://www.scottishpower.co.uk/legal/privacy-policy>), Broadband Price Comparison on Behalf of Currys, Royal Airforce Benevolent Fund Charity, National Deaf Children's Society Charity, Love Life, Claim My Loss, ActionAid UK, PDSA Charity, Utilita Energy, British Gas, PMDSC Ltd., Repair And Assure Ltd., 1 Stop Claims, Dogs Trust, NTT, GROCERY DELIVERY E-SERVICES UK LTD t/a Hello Fresh, Choose Leads (www.chooseleads.co.uk/wp-content/uploads/2021/05/Privacy-Policy-2021.pdf), Carphone Warehouse (Part of Currys plc), 3 Mobile, O2, Money Matters, Household Matters, Consumer Matters and Important Matters, Clear Wills, Consumer Insights, Cover Cloud (www.cover-cloud.com/privacy-policy), Claims Direct UK, Premier Offers Club, Royal Society for the Prevention of Cruelty to Animals (the RSPCA), Lead Intelligence Limited (www.leadintelligence.co.uk/compliance), Whitegold Media Ltd., Bill Compare.

Our Marketing Service Providers include: Matters Family (www.mhcmatters-ph.com), Lead 365 (www.lead365.co.uk/privacy-policy/), Data Locator Group Ltd, PDV Ltd whose clients include Consumer Lifestyles™ who's privacy policy can be found at www.consumerlifestyles.co.uk, Aura Media Group Limited and CAPTIVATE+, Perfect Ingenuity Ltd. They may also use your data for fraud prevention. Marketing Services Providers also collect data directly from Data Processors. The Marketing Services Providers we or our clients work with are strictly limited to only those organizations who we or our clients 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 or our clients will share your data under strict license terms with the Marketing Services Providers who like us, will use it to create products and services to help organizations better understand the likely characteristics of their customers; communicate with them more effectively; and find others like them across a range of marketing channels. This may mean that you receive advertising from organizations within the industry sectors listed above, that is more relevant to you via direct mail or when you visit a website, mobile app or watch TV. The Marketing Services Providers will not however advertise their own products or services to you. You are never obliged to take part and can opt-out at any time. To do so visit www.consumerfirstuk.com or call 02033181047.

What is “Profiling”?

We use some of the information you provide to identify lookalikes so our clients can target you with offers of goods and services tailored to you. We will never profile you on the basis of ethnicity, religion, politics or health as these are not valid reasons for which you should be targeted for marketing purposes and nor do we collect this information. We also do not make automated decisions about you which may have a negative impact on your rights. Marketing Services Providers we share your data with may also use profiling to target you for marketing purposes. Once again you can ask us to stop using your data in this way at any time.

To withdraw your consent please write to: **The Compliance Manager, Dynaxon IT Services Limited, 160, Kemp House, City Road, London EC1V 2NX**

By email to: compliance@dynaxonitservices.com;

Or visit: www.consumerfirstuk.com OR call 02033181047

To opt out of future calls from us, you can email us at helpdesk@consumerfirstuk.com OR call 02033181047.

Do we transfer your data to other countries?

We work with buyers such as our partners and affiliates in the UK and we call you on their behalf for marketing purpose with the brand name Consumer First UK with offers of goods and services tailored for you. We act as processors under strict instructions from our controllers and marketing service providers. We and they monitor the calls we make to ensure quality is controlled and they regularly inspect our premises and check that security and data protection standards are of the highest quality. We send data to controller and marketing service providers working in the UK.

International Data Transfers

External third-party service providers who may process personal data on our behalf may be based outside the UK or EEA so their processing of your personal data will involve a transfer of data outside the UK or EEA.

Whenever we transfer your personal data out of the UK or EEA, we ensure a similar degree of protection is afforded to it by ensuring that appropriate safeguards are implemented. For example, we will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data, where we have adopted standard contractual clauses approved for use in the UK and EEA to safeguard the data, or where a derogation applies (for example, if you have given consent to the transfer).

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the UK or EEA.

Where will my personal data be kept?

Once we have received your personal data, we will use recognized industry standard procedures and security features to try to prevent unauthorized access, misuse, disclosure and breach towards confidentiality, integrity and availability.

Your personal data will be under the control and use of Consumer First UK. It will be held on our computer systems and servers located at our head office. When we print your personal data, this will be in the possession and control of our employees at all times and will be securely disposed of when it is considered to be of no further use.

Marketing

We and our partner companies or 3rd party clients would like to contact you for marketing purposes and to promote new services to you only after we have obtained the correct lawful permission to do so. In no other circumstances will your personal data will be shared or disclosed with any other third party organizations. This may be by post, telephone, fax or email. If you do not wish to receive direct marketing from us please contact us with your request. Again, to opt out of future calls from us, you can email us

At helpdesk@consumerfirstuk.com OR call 02033181047

How long will we keep your data for?

We will only keep your personal details for as long as is necessary or as long as you want. The law does not put a time limit on the amount of time we should hold your personal details for but as long as you are happy to hear from us we will continue to contact you. As we explain in the section marked “what are my rights?” You can withdraw your consent to us at any time.

What are your rights?

You have a number of rights under the law which include;

- A. Right to be informed
- B. Right of access
- C. Right to rectification
- D. Right to be forgotten
- E. Right to restriction of processing
- F. Right to data portability
- G. Right to object
- H. Rights related to automated individual decision-making, including profiling
- I. Right to withdraw consent at any time where relevant
- J. Right to lodge a complaint with a supervisory authority

A. Right to be informed - When we collect your data we have to tell you what we are going to do with it primarily through this Privacy Policy and consent statement.

B. Right of access - You have the right to contact us in writing to request details of the

information we hold about you.

C. Right of rectification - You have the right to ask us to rectify information that we hold about you if it is inaccurate or incomplete.

D. Right to be forgotten - This is also known as the right to erasure and gives you the right to request your information be removed if there is no compelling reason for its continued processing. A word of warning though we keep a list of people who have asked not to be contacted which we use to ensure that you receive no further marketing from our group or clients as a result of our activity. Without this list your data could enter our system again from another source and we would have no record of the fact that you asked us not to contact you.

E. Right to restrict processing - this is the alternative to erasure and gives you the right to tell us to stop processing your data but allowing us to keep enough information about you to ensure that your wishes are respected in the future.

F. Right to data portability - this gives you the right to ask a holder of your information to transfer that information to another business. This right would most commonly used if you were switching banks, insurance companies, utilities companies and mobile phone providers.

G. Right to object - you have the right to object to the processing of your data for marketing purposes and profiling for marketing purposes. You also have the right to ask us to cease processing based on our legitimate interests, where there is no overriding justification for the processing of your data. Your rights and freedoms override our interests.

H. Rights related to automated decision making including profiling - we do not use automated decision making processes which would have a potentially damaging effect on you. But if we did, you have the right to obtain human intervention, express your point of view, obtain an explanation of the decision and challenge it.

I. Right to withdraw consent at any time where relevant - you have the right to withdraw your consent to the processing of your information at any time and we must provide you with the information needed to do so, at the time we collect your data and each time we contact you. You can withdraw consent in the following ways;

In writing to: The Compliance Manager, Dynaxon IT Services Pvt Ltd, 160, Kemp House, City Road, London EC1V 2NX

By email to: compliance@dynaxonitservices.com;

Or visit: www.consumerfirstuk.com OR call 02033181047

To opt out of future calls from us, you can email us at helpdesk@consumerfirstuk.com OR call 02033181047.

J. Right to lodge a complaint with a supervisory authority- If we cannot deal with your complaint to your satisfaction you also have the right to complain to a relevant supervisory authority which include;

The Information Commissioners Office <https://ico.org.uk/concerns/>

The Direct Marketing Association <https://dma.org.uk/contact>, and

The Advertising Standards Authority - <https://www.asa.org.uk/make-a-complaint.php>

Do we collect data from other sources?

Occasionally we collect personal information from third parties but when we do we check that they have your consent to share your information with us.

When do you have to share my data?

On rare occasions we may be asked to share your information for the prevention of fraud or with

regulatory bodies who are investigating complaint made by a consumer.

Cookie Policy

We may obtain information about your general internet usage by using a cookie file which is stored on your browser or the hard drive of your computer. Cookies contain information that is transferred to your computer's hard drive. They help us to improve our site and to deliver a better and more personalized service. Some of the cookies we use are essential for the site to operate.

- `__utma` This cookie is used to monitor the number of times a visitor has been to the site related to the cookie, when they first visited the site, and when they were last on the site.
Google Analytics uses the information from this cookie to calculate things like Days and Visits to purchase.
- `__utmb` These two cookies work together to establish how long a visit has taken. b signals when a user enters the
`__utmc` site and c signals when a user leaves.
- `__utmz` Captures how a visitor accessed the site including: which search engine was used, what link was clicked on, what keywords were used and geographical location.
- `__utmx` Used for A/B or multivariate testing using Google web optimiser.

Please note that our advertisers may also use cookies, over which we have no control. You can block cookies by activating the setting on your browser which allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies as soon you visit our site.