

GDPR ARTICLE 5 COMPLIANCE

PURPOSE of STATEMENT

To see whether ESI.info conforms to the principles outlined in Article 5 for the management and processing of personal data.

CONCLUSION

ESI.info can demonstrate compliance with the six principles as required by section 2 of Article 5 of the GDPR.

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Compliance with Article 5 of the GDPR

Principles relating to the management of personal data are laid out in clauses a, b, c, d, e and f. Indented answers in non-italicised text state ESI.info's position.

1. Personal data shall be:

- a. *Processed lawfully, fairly and in a transparent manner in relation to the data subject ('lawfulness, fairness and transparency')*

Website – registered users and visitors

Personal information processed for registered website users or visitors to our websites is covered by our [Privacy and cookies policy](#).

When anyone creates an account on our website, we provide a clear link to our privacy policy.

The privacy policy is updated to reflect any ongoing changes to policies or cookies. We do not use pre-checked boxes on sign up forms.

Offline research

Personal data that is researched and captured offline is obtained from a variety of publicly available resources including digital directories, journals and magazines, and websites of companies identified as being relevant to the products and services we offer.

Third party data

From time to time we purchase or rent personal data from list brokers, or use personal data that publicly available. Any data we use is tagged so we can identify its origin. We do not integrate externally sourced data into our own systems until we have taken ownership of the data as a result of a sales process.

- b. *Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes ('purpose limitation')*

ESI.info only collects data relating to the built environment.

On the buy side we research and collect data on companies and people involved in the planning, design, specification and implementation of projects relating to the built environment. Over 95% of the data relates to companies and individuals based in the UK.

On the sell side we research and collect data on companies offering products and services required to complete built environment projects.

- c. *Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ('data minimisation')*

The data we collect is limited as follows:

On the buy side, we collect and classify businesses and the people that work in them who are involved in the development or management of the built environment. Businesses we are interested in include consultants, contractors, government agencies and clients with commercial or industrial property.

On the sell side, we collect and classify information on individuals in B2B organisations who make or influence marketing decisions.

- d. *Accurate and, where necessary, kept up-to-date; **every reasonable step must be taken** to ensure that personal data are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay ('accuracy')*

We audit our data on a continuous basis using a combination of human research skills and artificial intelligence. For example, any email addresses that are 'hardbounced' are checked as they usually indicate that changes will need to be made to records to make sure they are up-to-date and accurate.

We encourage any third parties that we supply data to advise us of any inaccurate records so we can investigate and correct them.

Complex organisations which are likely to change often are checked where possible every year. Individual records that have not been verified in over 48 months are suppressed from lists supplied to 3rd parties.

We check externally held suppression files – Telephone Preference Service (CTPS and TPS) and MPS – once a quarter.

- e. *Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed ('storage limitation')*

Any contact that ceases to be relevant is marked up for suppression and the reason recorded (for example, they have left the company they worked at, have retired, or are deceased) and is filtered out of any selections for direct marketing activity automatically.

A record is kept of all unsubscribes from digital information products and removed from the corresponding lists, including lists we keep for mailing communications on behalf of our clients.

When an individual opts out of any of the following direct marketing channels – telephone, email and post – a record is kept and the corresponding data is automatic screened from any list selections.

- f. *Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures ('integrity and confidentiality')*

All individual information is kept on secure servers behind firewalls. All databases are password protected. Systems are backed up every 24 hours.

Compliance with all the above can be demonstrated on request as required by section 2 of Article 5 of the GDPR.

*2. The controller shall be responsible for, and be **able to demonstrate** compliance with, paragraph 1 ('accountability').*

Completed by
Charles Robertson, Managing Director, ESI.info, 24th April 2018