

## Privacy Policy

Last updated on 15<sup>th</sup> February 2021, in accordance with the requirements of the General Data Protection Regulation (GDPR), the Data Protection Act 2018 and PECR.

### Who are We?

This is the Privacy Policy of Supreme Consumers, which is the Trading name of NSD Technologies Pvt. Ltd. A company registered in India (Registration # U72900WB2010PTC152612) whose registered address is 25, Amartolla Street, Kolkata – 700001 and is registered with the Information Commissioner Office vide ICO Registration Number ZA443079.

NSD Technologies is a call centre providing services on BPO Projects and dedicated to performing its business in accordance with the General Data Protection Regulation. We operate under our brand name, Supreme Consumers and we also run marketing surveys by telephone on behalf some of the UK's leading brands helping them to communicate information about their products, promotions, latest offers and services they provide. As described, we conduct these marketing surveys via telephone and we always display a valid telephone number to identify us. You can anytime choose to call back and change your marketing preference or stop from receiving any future calls.

### What data we collect; what do we use your data for and how do we use your data?

We collect and confirm information about you that includes your name and contact details, that you volunteer to us such as your telephone number, mobile phone number, postal address and email address. We may also ask you for your date of birth and during the course of our lifestyle survey, information about your preferences, likes and dislikes. We never collect financial information pertaining to your bank accounts, credit card details and nor will we collect information sensitive to you known as 'Special Category' data such as your medical background, political or religious beliefs.

The data we collect from you is for direct marketing purposes which means we share; from time to time, your details with reputable companies who may contact you with information about their products or services which may be of interest or benefit to you. You can change your marketing preferences or request we stop sharing your information or details at any time. Please refer to our '**Contact Us**' section at the bottom of the privacy policy on how to do this.

Your data may also be used for data enhancement, validation, information verification, suppression, credit and risk management, tracing and to the extent permitted by law, individual reference or lookup services, by us and other named companies as above.

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We may even share your information if requested for fraud prevention with regulatory bodies for investigation purposes in case of consumer complaints

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.

We may communicate with you or the companies we share your data may communicate with you through any of the following channels –

- Email
- Postal/Mail
- Live Telemarketing
- SMS/MMS
- Online Digital/Social Media

Our brands and associated companies or their brands, mentioned in this privacy policy, may also contact you to ask questions for direct 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 you provide 'consent' to do so.

Companies who may wish to communicate could fall under the following verticals/industries:

- **Retail:** Online retail, General stores, Automotive (including sales, accessories, rentals or repairs), Property, Fashion and clothing, Telecoms and Utilities, Home Services, Mail Order
- **Finance:** Pensions, Loans, credit cards and mortgages, Investments & savings, Wills, Funeral Planning
- **Insurance:** Home, Car, Travel, Pet, Personal, Other insurances
- **Travel:** Holidays, Hotel, Airlines, Travel booking
- **Lifestyle:** Health & Well-being (including mobility), Fitness, Charities, Media & publishing companies, Leisure, Gaming, Legal Services, Educational institutions, Market Research

## Data Profiling

We may use your data to group consumers into profiles, who are more likely to have common habits and interests. Profiling is summarizing consumer data which include lifestyles, preferences, demographics, and purchasing patterns. It offers additional insight into customers and to help our clients to identify and gain a deeper understanding of their

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target market, enabling relevant and tailored marketing. We do not use profiling or any of the data we hold to make automated decisions about you.

## **Legal Basis for Processing Your Personal Information – Legitimate Interests**

The data we collect from you is for direct marketing purposes which means we share; from time to time, your details with reputable companies who may contact you with information about their products or services which may be of interest or benefit to you. Your data must be processed in line with one of the legal bases defined under the GDPR:

### **Legitimate Interests**

Data may be processed in pursuance of legitimate interests that may include using your data for postal and telephone marketing for ourselves or others but in either case communication will be in relation to products or services that may be of interest or benefit to you. The benefits being pursued by our organisation are the running of marketing services and data business. An **example** of this is where you have shown an interest in reducing your monthly energy bills. We may share your details with more than one energy company to help provide you with a wider choice of provider. In this instance, we will have conducted a legitimate interest impact assessment. This could include the data you provide to us today, or at any time in the past and in the future until you inform us of any changes to your marketing preferences.

### **Consent**

In this instance you have freely given your consent for a specifically named organization(s) to contact you by the channels to which you have agreed to. Supreme Consumers do not conduct any automated marketing such as voice broadcasting, all surveys are completed Voluntarily and in line with the correct laws that 'consent' requires.

### **Who may we share your data with?**

- Our group companies and Brands, namely, NSD Technologies Pvt. Ltd, (<http://www.nsdtechnologies.com/>) and Supreme Consumers, and Compare Today Survey (<http://www.comparetodaysurvey.com/>).
- Marketing Service Providers/Media houses: Marketing Service Providers are companies who collect data from Data Controllers, such as ourselves, and help their clients tailor their 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 organizations 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

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share your data under strict license terms with the Marketing Services Providers listed below, 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.

- Our Marketing Service Providers include: PDV Ltd, whose clients include Consumer Lifestyles™ whose privacy policy can be found at <https://www.consumerlifestyles.co.uk>. Aura Media Group Limited, whose privacy policy can be found at <https://www.auramedia.com/privacy-policy> Money Expert Limited, Imperial Telecom Ltd with (company number 08569770) who will contact clients to review their current landline/broadband packages and make offers with relation to a better deal, Retail: home services.
- Your data may be shared with 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. For more information see <https://www.fca.org.uk>
- Groups of recipients within the specific industry sector listed above

#### **Data Retention and how long will we your data for?**

We follow strict rules in accordance with the GDPR and make sure the information is:

- used for specified, explicit purposes
- used in a way that is adequate, relevant and limited to only what is necessary
- accurate and, where necessary, kept up to date
- kept for no longer than is necessary or as long as you want
- securely handled, including protection against unauthorized or unlawful processing, access, loss, destruction or damage

#### **Your Rights**

The law provides the following rights to individuals –

- **The right to be informed** – This right provides the data subject with the ability to ask a company for information about what personal data (about him or her) is being processed and the rationale for such processing. To obtain details we hold, you may send an email to [Compliance@supremeconsumers.com](mailto:Compliance@supremeconsumers.com)
- **The right of access** – his right provides the data subject with the ability to get access to his or her personal data that is being processed. This request provides the right for data subjects to see or view their own personal data, as well as to request copies of the personal data. To obtain details we hold, you may send an email to [Compliance@supremeconsumers.com](mailto:Compliance@supremeconsumers.com)

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- **The right to rectification** – This right provides the data subject with the ability to ask for modifications to his or her personal data in case the data subject believes that this personal data is not up to date or accurate
- **The right to erasure** – Also known as right to be forgotten, this right provides the data subject with the ability to ask for the deletion of their data. This will generally apply to situations where a customer relationship has ended. It is important to note that this is not an absolute right, and depends on your retention schedule and retention period in line with other applicable laws
- **The right to restrict processing** – this right provides the data subject with the ability to withdraw a previously given consent for processing of their personal data for a purpose. The request would then require the company to stop the processing of the personal data that was based on the consent provided earlier
- **The right to data portability** – This right provides the data subject with the ability to ask for transfer of his or her personal data. As part of such request, the data subject may ask for his or her personal data to be provided back (to him or her) or transferred to another controller. When doing so, the personal data must be provided or transferred in a machine-readable electronic format
- **The right to object** – This right provides the data subject with the ability to object to the processing of their personal data. Normally, this would be the same as the right to withdraw consent if it was appropriately requested and no processing other than legitimate purposes is being conducted. However, a specific scenario would be when a customer asks that his or her personal data should not be processed for certain purposes while a legal dispute is ongoing in court
- **Rights in relation to automated decision making and profiling** – This right provides the data subject with the ability to object to a decision based on automated processing. Using this right, a customer may ask for his or her request (for instance, a loan request) to be reviewed manually, because he or she believes that automated processing of his or her loan may not consider the unique situation of the customer

## Contact Us

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

\* Email us at [compliance@supremeconsumers.com](mailto:compliance@supremeconsumers.com)

\* Please call 01887857540 or (leave voicemail after the tone)

## ‘Our EU Representative’

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**Data Rep Service**

120 High Road,  
London  
N2 9ED

Telephone: - +44 (0)203 129 5745 | ICO ZA844090

[www.datarep-service.com](http://www.datarep-service.com)

Email: - [uk@datarep-service.com](mailto:uk@datarep-service.com) | [nsdtechnologies@datarep-service.com](mailto:nsdtechnologies@datarep-service.com)

**Copyright and Changes to the Policy**

© All copyright remains the property of NSD Technologies Pvt. Ltd.

NSD Technologies reserves the right to modify or update this Privacy Policy from time to time.

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