

<b>Document Title</b>	<b>Code of Practice 8: Marketing to data subjects</b>
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Relevant to	All academic and professional services staff

1. External advertising and marketing includes to prospective students, prospective staff, applicants, and alumni, as well as to other individuals or bodies.
2. Be aware that there are strict rules about marketing under the General Data Protection Regulation (GDPR) – there is a right to object to direct marketing - this requires organisations who are marketing to individuals to obtain unambiguous consent, resting on a “clear affirmative action” by consumers. Therefore:
  - Make sure that you have clear unambiguous consent to market to people;
  - Make sure that any list, spreadsheet, database etc is listed on the relevant [retention schedule](#) with a retention period (refer to your [Records Coordinator](#)); this includes lists or spreadsheets of alumni;
  - Always use opt-in boxes when collecting data;
  - Always give each person the ability to opt out of further marketing, with clear and easy instructions as to how to do that, on each marketing communication you make;
  - Make sure on a regular basis (e.g. annually) that you have up to date contact details for those people;
  - Remove people from databases / lists / spreadsheets when you have had no contact from them for two years;
  - Keep a record that you have removed people, and a record of those who have opted out; the record that you keep should comprise enough information for you to be able to identify that person, but not unnecessary data;
  - Always check the origin and accuracy of data obtained from elsewhere.
- Be aware that both individuals and corporate bodies can opt out;
- If necessary (for instance if you are buying in a list, or researching and getting contact details from the internet or some other source) screen against
  - Telephone Preference Service (TPS)
  - Corporate TPS
  - Mail Preference Service (MPS)
  - Fax Preference Service (FPS)
  - Our own opt-out records

3. Internal advertising to current staff and current students is considered acceptable, subject to other regulations, policies and procedures in place within the University.
4. Lists / databases / spreadsheets of contacts that staff members already had prior to GDPR on 25/05/18: consider whether you have already complied with the above bullet-points. If you have not, you may not be able to market to these individuals in future. To contact individuals on these lists:
  - Contact details should have been obtained fairly;
  - They should have given specific consent for marketing, or
  - They are “previous customers” and were given a chance to opt out.

Refer to the Information Commissioner’s Office short guidance, and follow its advice:  
<https://ico.org.uk/media/for-organisations/documents/1551/direct-marketing-checklist.pdf>