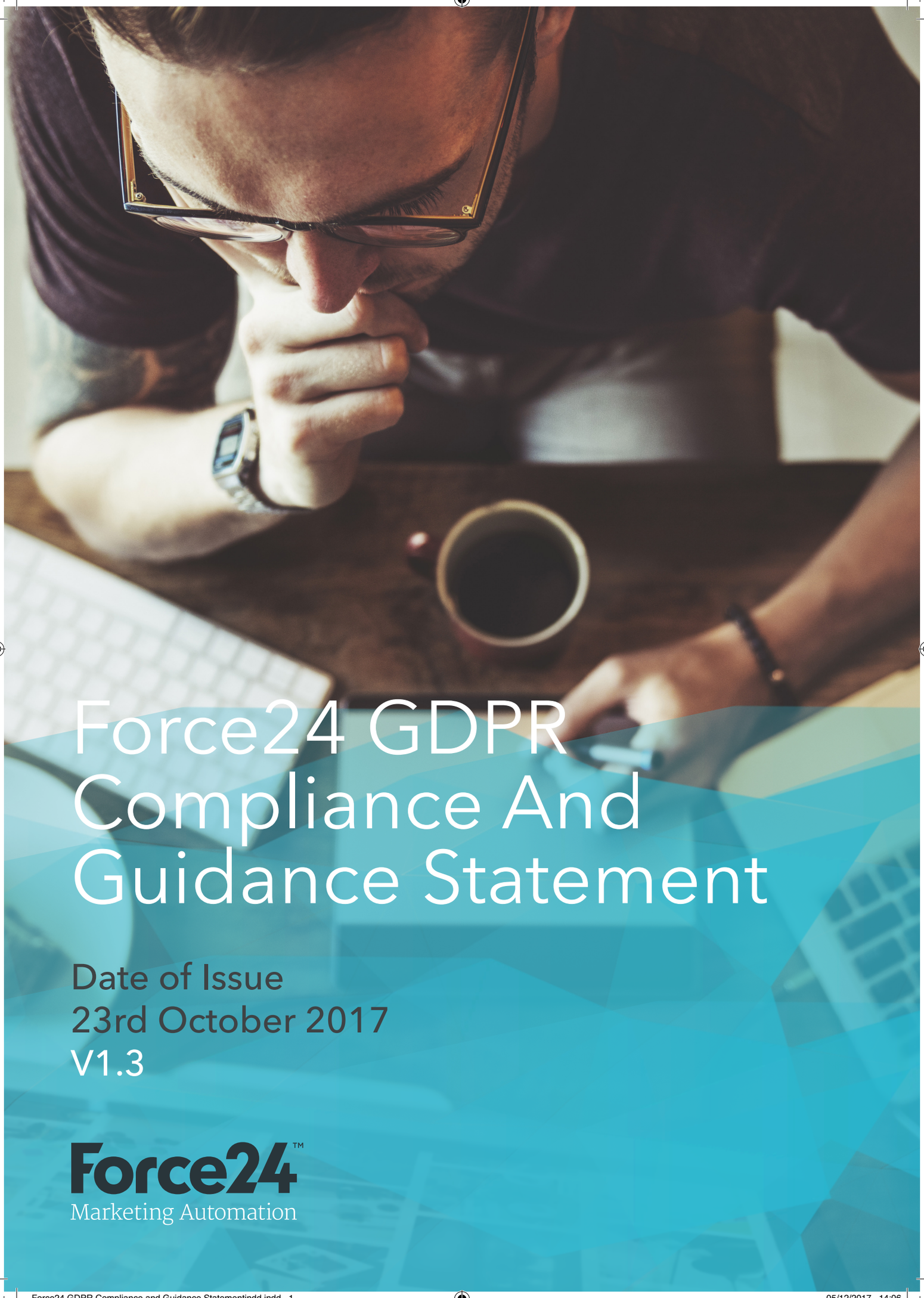


Force24 GDPR Compliance And Guidance Statement

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Force24™
Marketing Automation

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Introduction

GDPR is looming and Force24 is working tirelessly to ensure your total compliance with technical controls where possible. Although the new regulations are demanding, rigorous and perhaps a little daunting, at Force24 we see marketing technology as the key to compliance within your marketing requirement under GDPR, and your automation platform the vehicle to support GDPR.

This statement is designed to answer the specific elements affecting marketers working with Marketing Automation. Below you will find an overview of the key themes you need to consider, and our technical solution to each of the requirements.

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Transfer Of Data

What does this mean?

The GDPR imposes restrictions on the transfer of data outside of the EU. This is to ensure consumers can be assured that the level of protection the GDPR provides cannot be undermined by external countries or international organisations.

The GDPR provide special exemptions on transferring your data outside of the EU. Namely:

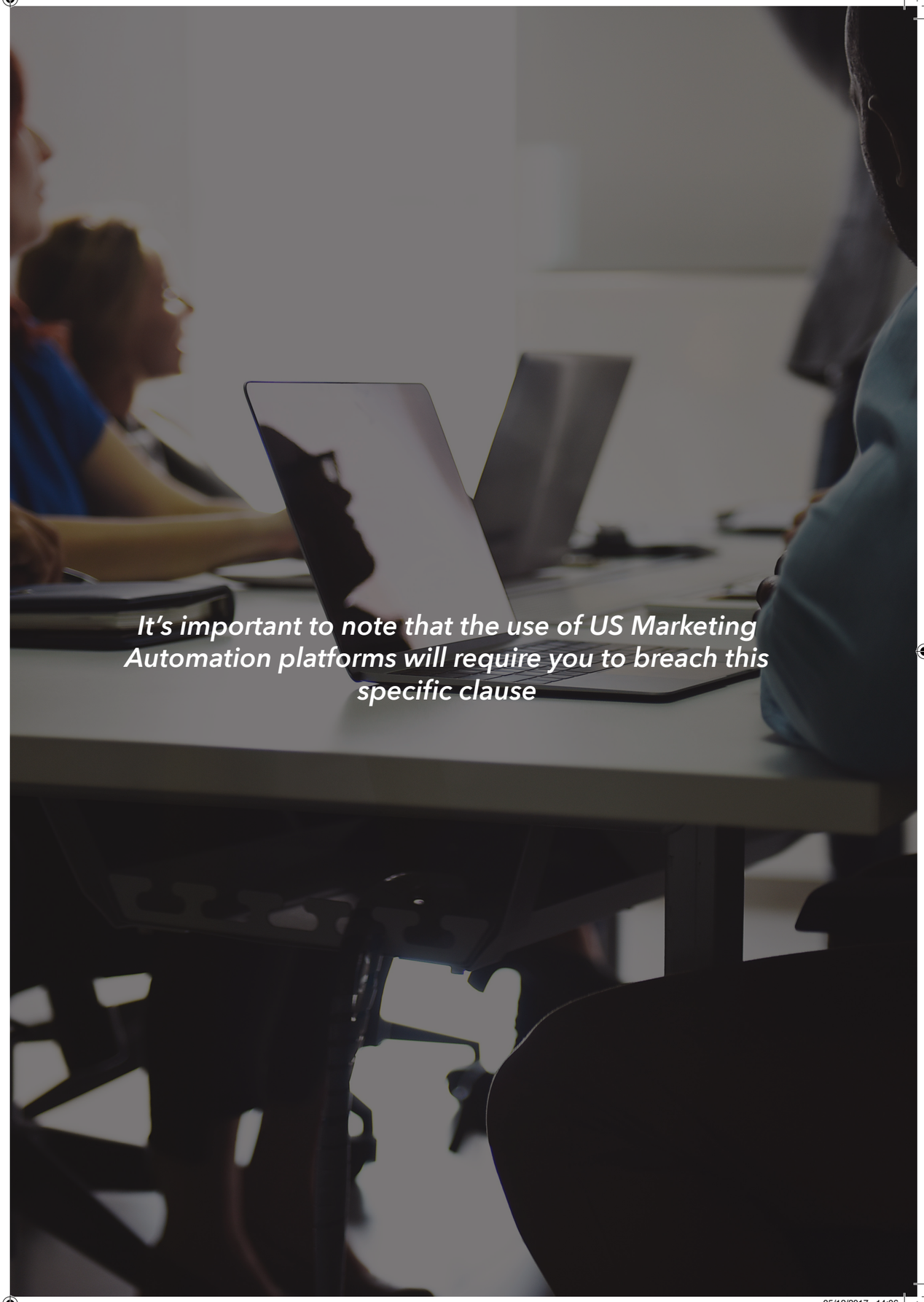
- made with the individual's informed consent;
- necessary for the performance of a contract between the individual and the organisation or for pre-contractual steps taken at the individual's request;
- necessary for the performance of a contract made in the interests of the individual between the controller and another person;
- necessary for important reasons of public interest;
- necessary for the establishment, exercise or defence of legal claims;
- necessary to protect the vital interests of the data subject or other persons, where the data subject is physically or legally incapable of giving consent; or
- made from a register which under UK or EU law is intended to provide information to the public (and which is open to consultation by either the public in general or those able to show a legitimate interest in inspecting the register).

It's important to note that the use of US Marketing Automation platforms will require you to breach this specific clause.

How does Force24 help?

Force24 will never ship your data outside of the UK. Force24's infrastructure is held within London and Glasgow.

All support professionals are located within the UK and EU member countries.



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The Right To Be Informed

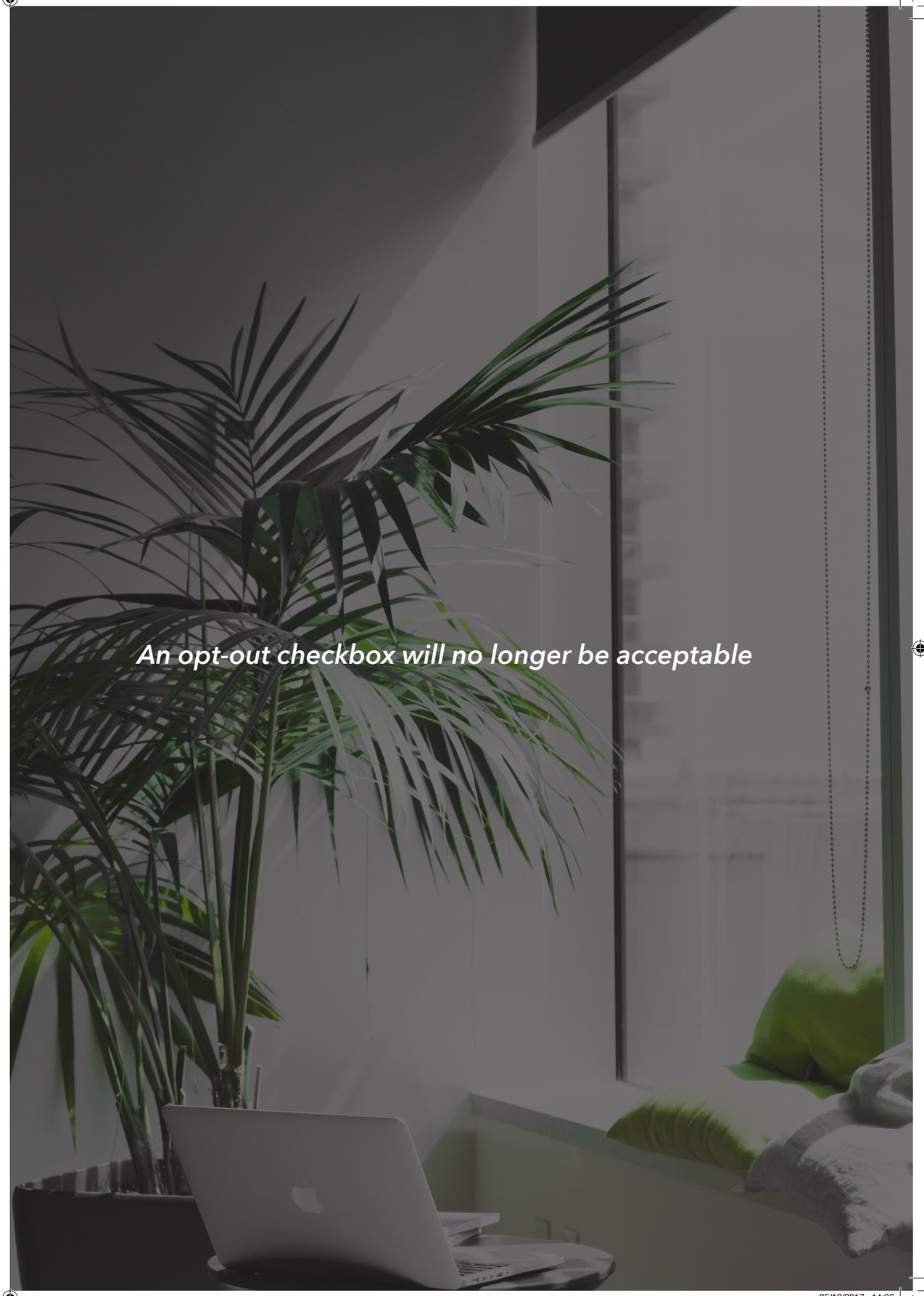
What does this mean?

This refers to your obligation to provide ‘fair processing information’, typically through a privacy notice. The information you provide about the processing of personal data must be concise, transparent, intelligible and easily accessible, written in clear and plain language. Your customers and prospects will need to give you “unambiguous” permission, and an opt-out checkbox will no longer be acceptable. Customers will need to deliberately opt-in to receive communications from you and be clear on what messaging they will receive. You will need to be able to prove this by keeping audit trails for all personal data that outlines when permission was granted and what for.

How does Force24 help?

Force24 has appointed a GDPR practitioner to develop a simple set of data collection guides, showing the most optimised yet fully compliant procedures. Once established, all clients will automatically inherit this approach for all data capture points managed within the Force24 platform.

All Force24 customers will have access to this document upon its release for all external data collection points.



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The Right Of Access

What does this mean?

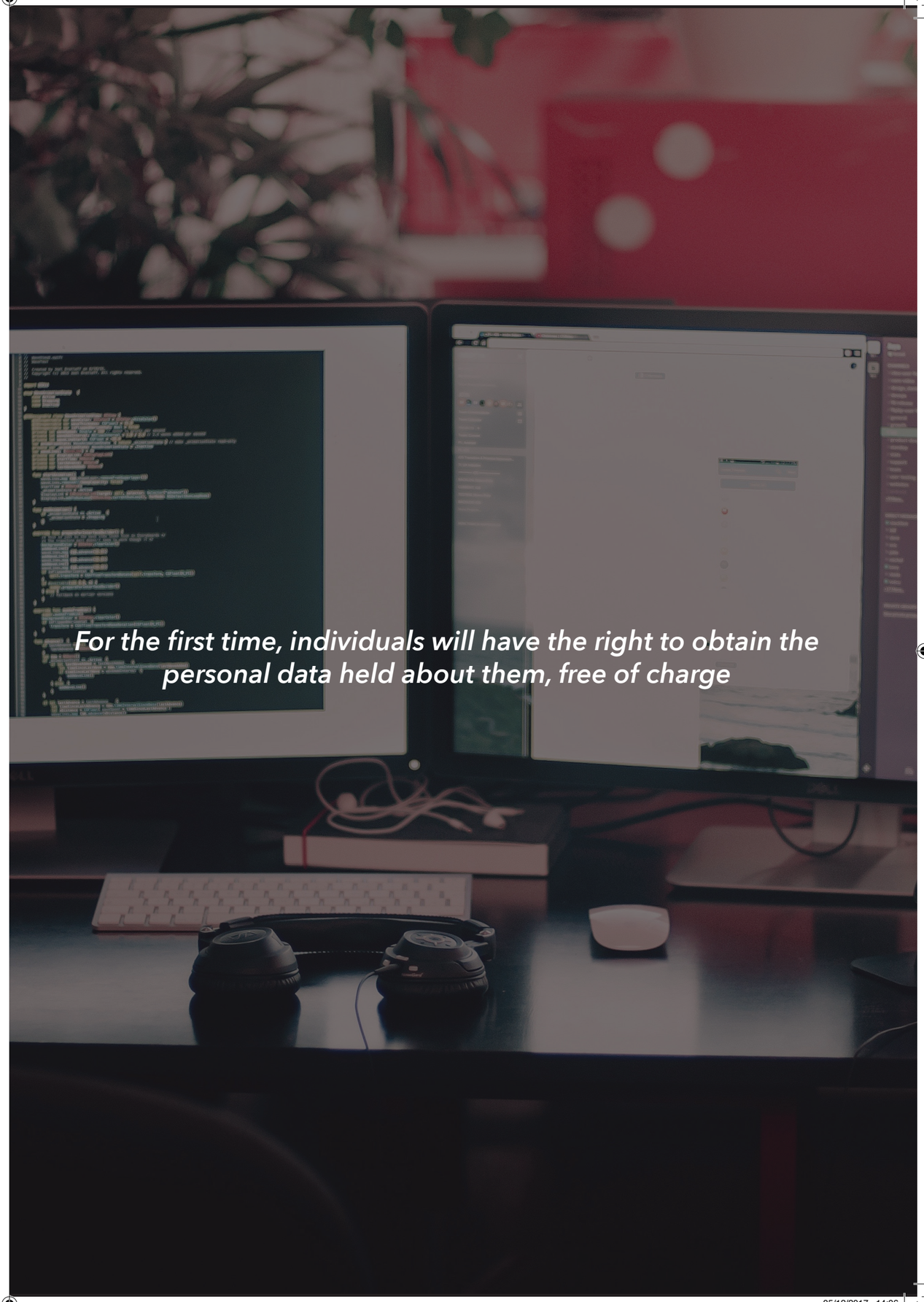
For the first time, individuals will have the right to obtain the personal data held about them, free of charge. You will need to ensure that you have a holistic view of where the data you hold on someone is being used, and exactly where across your business, as people will have the right to request confirmation that you're processing their data, for what reason and where. Information must be provided without delay and within one month of the request.

How does Force24 help?

Force24 has implemented a free to access report detailing all information held on any singular contact. The report may be requested at any time and will be delivered within 2 working days of your request.

The report will then be transmitted via a protected XLSX file for your onward transit to the necessary recipient.

PLEASE NOTE: Your obligations under GDPR may extend further than the marketing remit. It will therefore be necessary to ensure all other departments have sought appropriate solutions to the right of access.



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The Right To Rectification

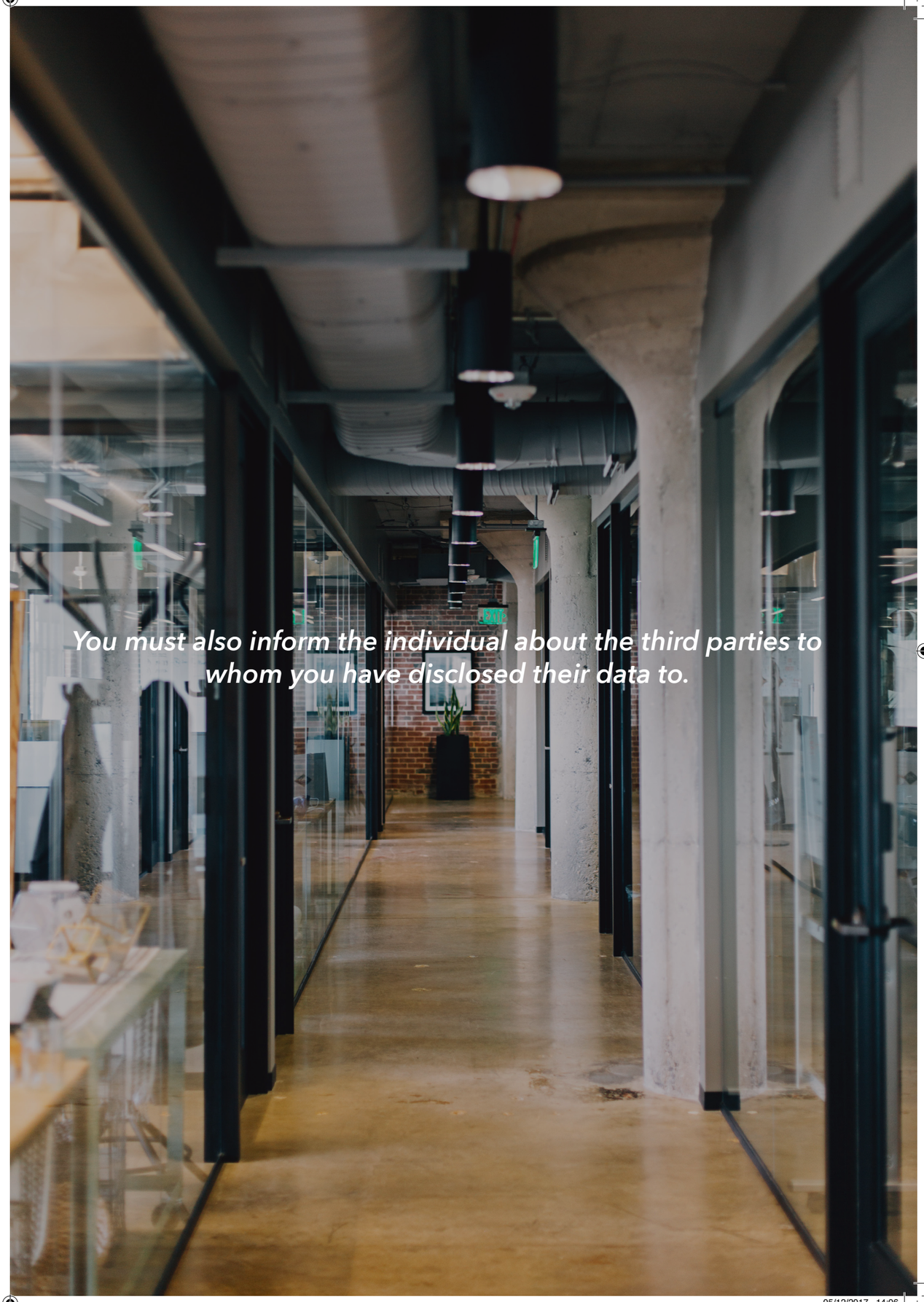
What does this mean?

Individuals can have their personal data rectified if it is incomplete or inaccurate. If the personal data in question has been disclosed to third parties, you must inform them of the amendments where possible. You must also inform the individual about the third parties to whom you have disclosed their data to.

How does Force24 help?

The Force24 platform will allow you to update any contact data held at a record level in a safe and secure manor. Any changes will take effect immediately.

PLEASE NOTE: Your obligations under GDPR may extend further than the marketing remit. It will therefore be necessary to ensure all other departments have sought appropriate solutions to the right of rectification.



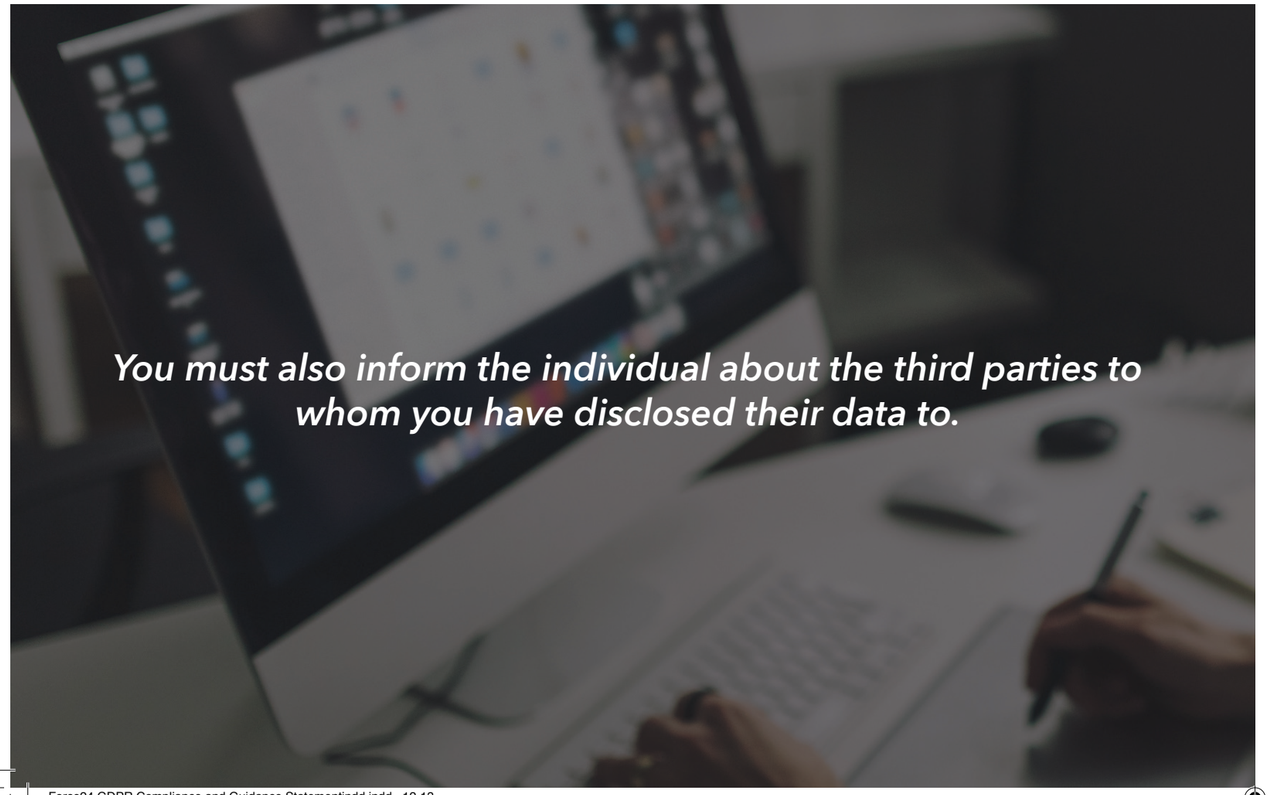
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The Right To Erasure
(Or Be Forgotten)

What Does This Mean?

Under GDPR, every individual has what's called the "right to be forgotten". This means that people can request that all the data you hold on them be permanently deleted. You will have to ensure that you have a process that easily allows this request and that you remove all the data you hold on that specific individual, across the whole of your business, not just your automation platform. This means you will also need to look at how your data is stored and shared across your business so that you can be confident it has been deleted from every place its held. It is your right to reject an individual's right to be forgotten, however you must have good reason to do so.

The issue with the right to be forgotten is you need a method of remembering you have forgotten the individual!



How Does Force24 Help?

Within the Force24 platform each individual has multi-dimensional permissioning, which enables you to set appropriate contact's statuses for Email, Direct Mail and SMS and, in addition to channel permission, an overall contact status setting will allow:

Active
Full data processing, active for marketing (subject to channel permissions)

Inactive
The individual is disabled. The contacts data will not be processed or interrogated in anyway but held in the secure data environment. No email or SMS can be sent to individuals in this state.

Removed
The individuals and all associated information has been removed. To ensure we do not allow contact in the future, a 256bit encrypted hash of their email address is stored to ensure the contact cannot be recreated at a later date by accident.

All activity collected by the Force24 platform associated to a removed individual will become obfuscated and maintained for statistical purposes within your account.

This setting cannot be overruled. To rectify any mistakes or activate any previously erased contacts, you must address a letter to the Force24 Head of Data Processing to state your reason.

PLEASE NOTE: Your obligations under GDPR may extend further than the marketing remit. It will therefore be necessary to ensure all other departments have sought appropriate solutions to the right to erasure.

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The Right To Restrict Processing

What does this mean?

This is an individual's right to suppression of their personal data. When processing is restricted, you are permitted to store the personal data, but not further process it. This applies when:

- An individual contests the accuracy of their data, and should be restricted until it has been verified.
- An individual objects to processing, and you're considering the request.
- An individual does not want data to be erased when processing has been unlawful and would prefer it to be restricted.
- The organisation no longer needs the data, but the individual requires the data to defend or exercise a legal claim.

How does Force24 help?

As with the right to erasure, the right to restrict processing is achieved by the use of the multi-dimensional permissioning aspect of the Force24 platform.

By using the Contact Status Inactive, you can assure the user will be held in a non-processed state.

This setting can be overruled by an authenticated user within the Force24 platform.

PLEASE NOTE: Your obligations under GDPR may extend further than the marketing remit. It will therefore be necessary to ensure all other departments have sought appropriate solutions to the right to restrict processing.



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The Right To Data Portability

What does this mean?

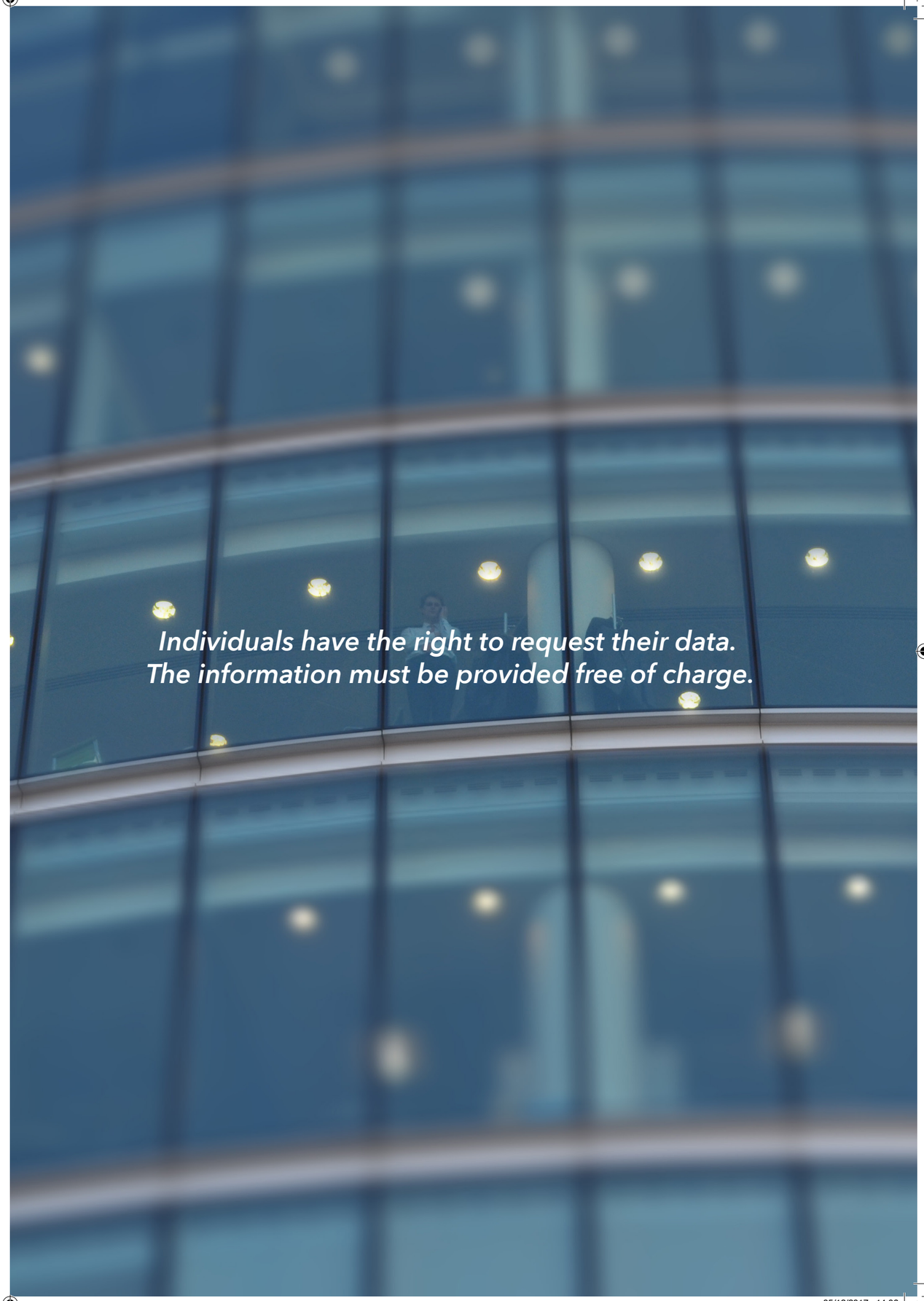
Individuals will also have the right to data portability, meaning they can request their data in a readable, electronic format in order to reuse it across different services. The information must be provided free of charge.

How does Force24 help?

Force24 has implemented a free to access report detailing all information held on any singular contact. The report may be requested at any time and will be delivered within 2 working days of your request.

The report will then be transmitted via a protected XLSX file for your onward transit to the necessary recipient.

PLEASE NOTE: Your obligations under GDPR may extend further than the marketing remit. It will therefore be necessary to ensure all other departments have sought appropriate solutions to the right to data portability.



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The Right To Object

What does this mean?

Individuals can say no to certain uses of their personal information, like profiling for marketing purposes. This means if you've lawfully collected data from a group of customers and then want to use that data analytically to look at shopping habits and create sales personas for example, an individual may request you stop processing their information.

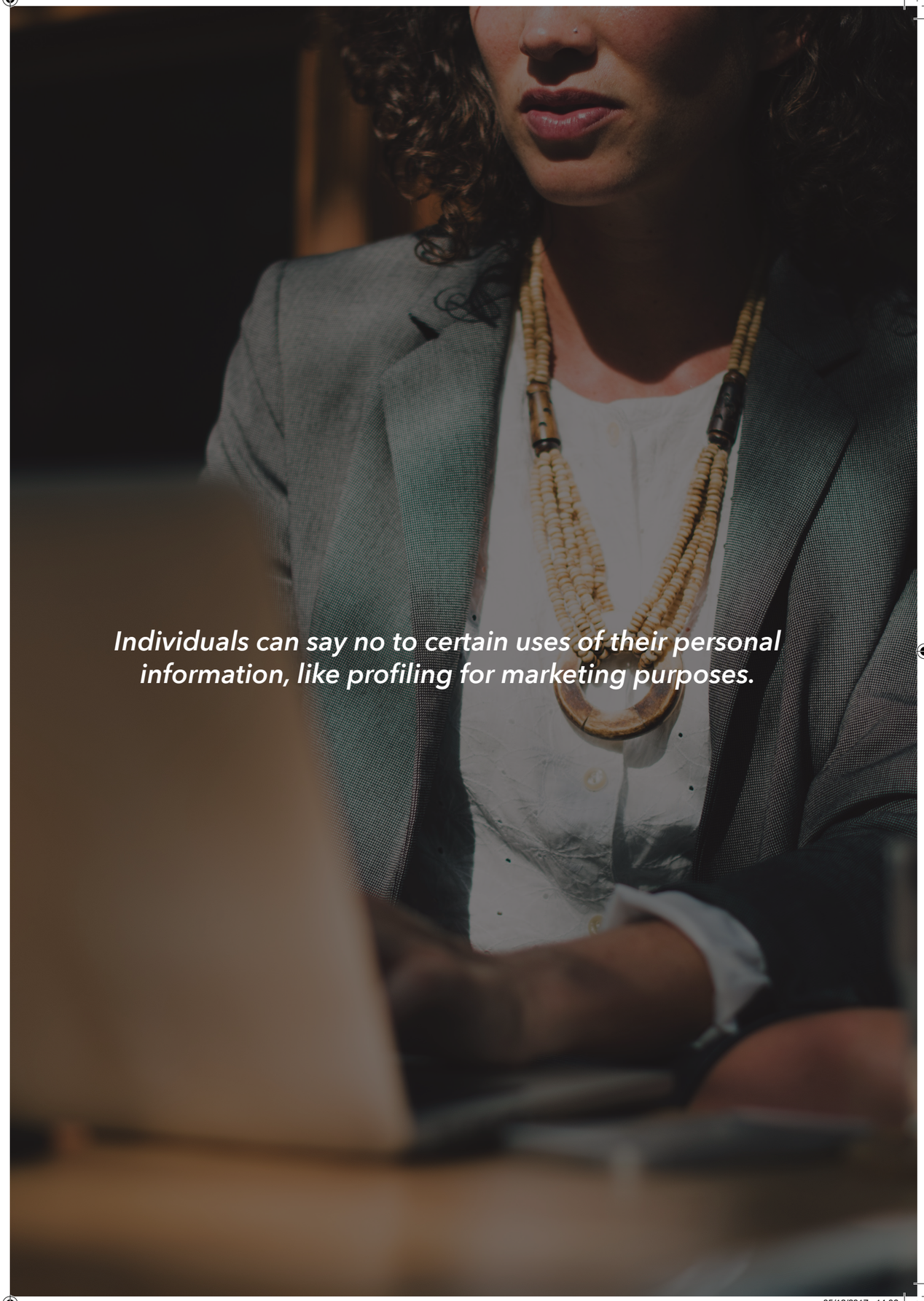
How does Force24 help?

If you haven't included 'profiling' in your original consent statement, it is advised that you implement within your Privacy Statement information relating to the process and procedure to object to processing.

Since you have no grounds to refuse, or exemptions, you must comply with the individual's request.

By using the Contact "Inactive" Status, you will cease to process this contact any further. Please note since profiling is no longer possible, the individual must forfeit the right to receive marketing messages.

PLEASE NOTE: Your obligations under GDPR may extend further than the marketing remit. It will therefore be necessary to ensure all other departments have sought appropriate solutions to the right to object.



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Rights In Relation To Automatic Decision Making And Profiling

What does this mean?

Individuals have the right not to be subject to a decision when it is based on automated processing and produces a legal effect, for example, declining a credit card. The individual must be able to obtain human intervention, be able to express their point of view and be able to obtain an explanation of the decision and challenge it.

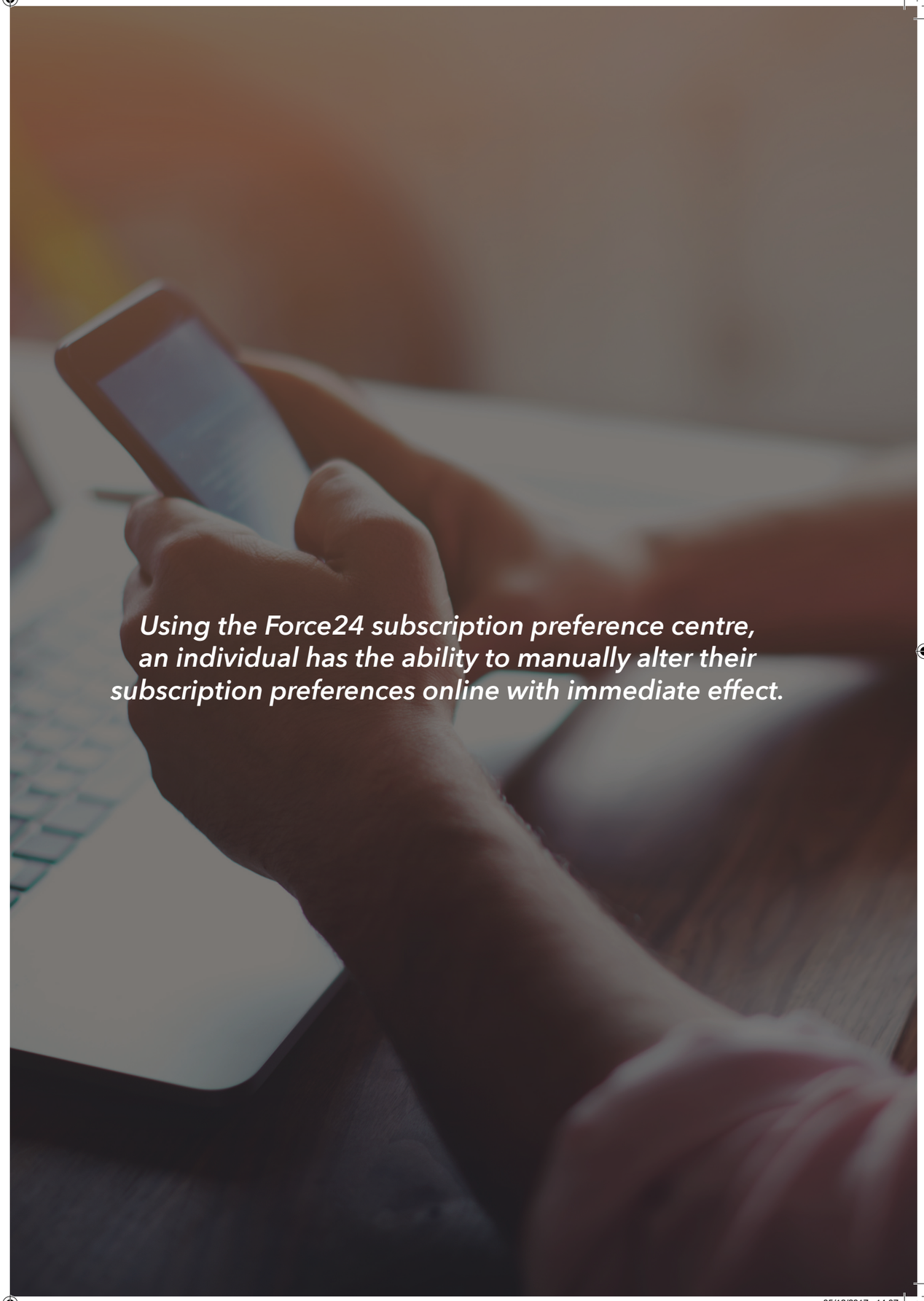
With regards to profiling, this is defined as automated processing intended to evaluate certain aspects of the individual to analyse or predict aspects, such as work performance, personal preferences or behaviour.

How does Force24 help?

All decisions made within the Force24 platform follow clear rules implemented by the authorised user of the platform. All decisions are revocable and can be subject to human intervention.

Organisations should ensure they have a suitable process for individuals to appeal against automated decisions made relating to their marketing preferences.

Using the Force24 subscription preference centre, an individual has the ability to manually alter their subscription preferences online with immediate effect.



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Legal Notes

Force24 operates to provide tools to your organisation's Data Processor, under the instructions and guidance of your organisation's Data Controller.

It is assumed by the ICO and Force24 that the Data Controller for the organisation is appraised of the full impact and their obligations under the GDPR. The data controller is ultimately responsible for ensuring that all processes implemented by the organisation are in line with its obligations under the GDPR.

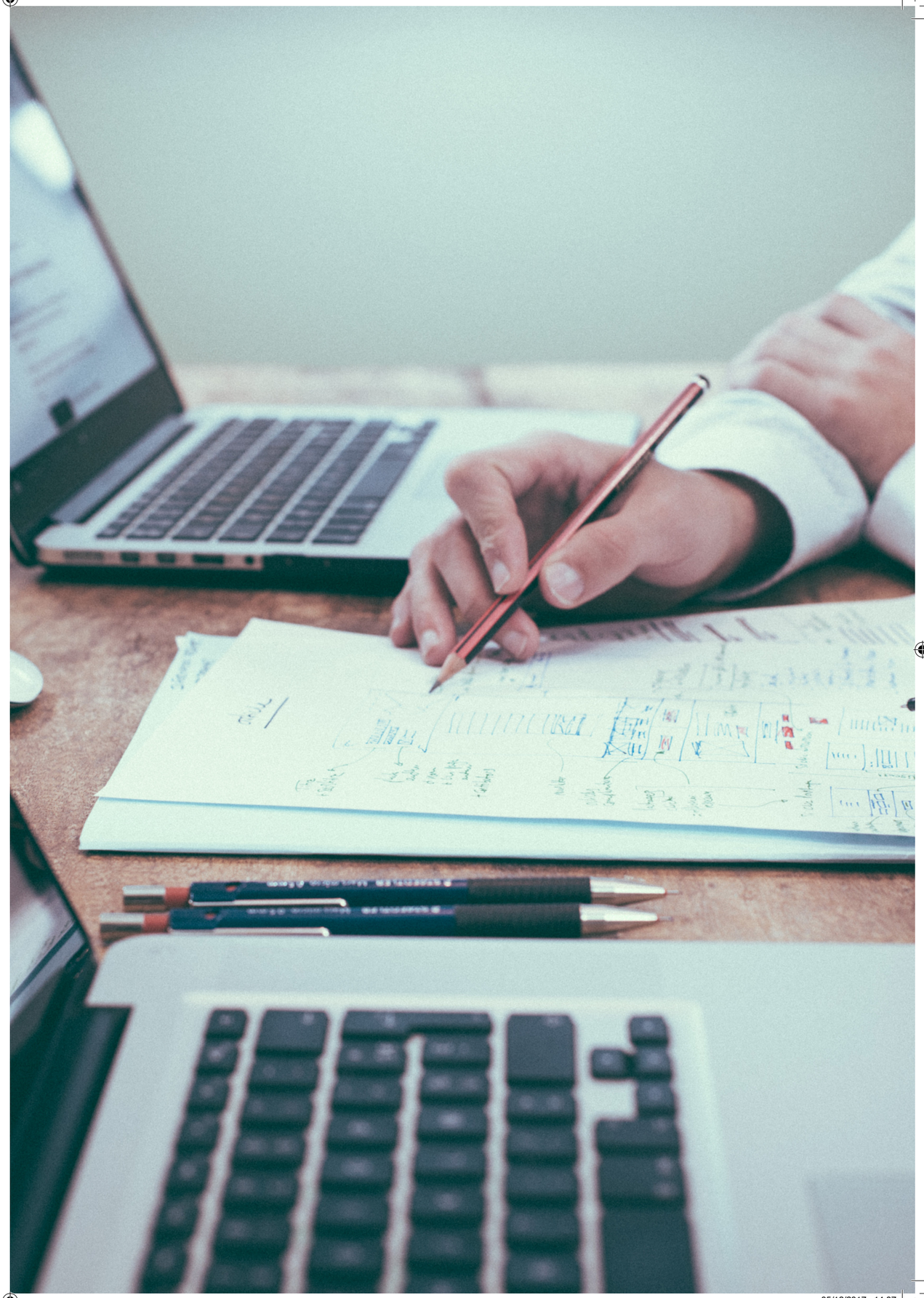
Force24 Strategic GDPR partnerships

Force24 has joined forces with Allott and Associates to provide a simple solution to help you navigate through the GDPR compliance minefield.

To organise a full GDPR audit for your business please visit:

http://landing.force24.co.uk/gdpr-deadline/home.html

Using the Force24 subscription preference centre, an individual has the ability to manually alter their subscription preferences online with immediate effect.



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About Force24

Force24 is a world-class, UK-built, cloud-based marketing automation solution used by enterprise clients and niche SMEs alike. Trusted by leading brands such as WorldPay, Aviva & npower, the intuitive platform empowers marketers to generate faster, more efficient & meaningful conversations with customers & prospects. The result? Increased conversions, revenue & campaign ROI.

In fact, thanks to 8 million data triggers & the expertise of Force24's in-house marketing pros, the platform helps generate £50m revenue for clients each month!

What's more, the Fore24 team isn't just made up of tech gurus and marketing pros. We even have our own in-house GDPR expert to ease every concern and ensure clients are fully regulation-ready!

Get in touch

For further information please visit **www.force24.co.uk** or call **0845 272 5990**. Alternatively, to drop us a line or sign up for our upcoming webinars, email **info@force24.co.uk**

Force24™
Marketing Automation

Force24 Ltd, Office 2, Indigo Blu, 14 Crown Point Road, Leeds, LS10 1EL – Tel: 0845 272 5990 – info@force24.co.uk

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