All Progress leads Private Limited C-3/4 Ist floor Rajouri Garden New Delhi :110027 Registration Number: U74999DL2018PTC342271

**ICO number : ZA487568** 



#### Who are we?

Progressive sales is a BPO services company who conduct marketing survey by telephone for some of the UK's leading company. We work with many of the UK's leading brands to help them target their offers more precisely by collecting key purchasing information on their behalf. Progressive sales provide such organizations with the key information they need in order to better target their products and services.

Progressive sales, is committed to maintaining the privacy and security of personal information. This Privacy Policy Statement contains information about our policy regarding the collection and use of data through market research surveys.

# Ministry of Corporate affairs Data Protection Law:

Throughout this Privacy Notice we will talk about Data Protection Law, this predominantly means the Data Protection Act and the Privacy and Electronic Communications (EC Directive) Regulations 2002

### **How Do We Use Your Personal Information?**

We may from time to time supply your information to third parties for marketing purposes. The main purposes to which your data are put are to allow third parties to provide you with information about goods and services which they think may be of interest to you and/or to maintain any existing relationship they may have with you.

Such information may be provided by marketing communications or advertising which is tailored to your interests. These questions will be on behalf of companies who we will name at the end of the call and who will only contact you if you consent. Be assured that any such parties will only be allowed to use your data in accordance with The General Data Protection Regulation (GDPR 2018) and other applicable law relating to privacy.

If you don't want to share your details, you can ask us to stop at any time now or in the future.

#### What Information Do We Collect?

We collect personal information about you that includes your name and contact information that you volunteer such as mobile number, telephone number, email address and postal address. In order to process your interest, we may need to collect your date of birth, about your preferences likes and dislike.

We never collect credit card details, bank account number and any other sensitive information life medical history, political or religious beliefs. We may monitor or record your Calls, Emails, SMS or other communications but we will do so in accordance with data protection legislation and other applicable law. Monitoring or recording will always be for business purposes, such as for quality control and training (e.g.

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where you call our compliance or customer service department), to prevent unauthorized use of our telecommunication systems and Sites, to ensure effective systems operation, to meet any legal obligation and/or to prevent or detect crime.

We will periodically review your personal information to ensure that we do not keep it for longer than is permitted by law.

### Where is your personal information held?

The Personal information we collect is stored securely in our in house secured servers. We use different network security technologies to help protect the information from any unauthorized access, use, or disclosure. The information will be accessible by only a limited people who have been authorized to do so inside our organization, and also, we have established procedures to cope with the events that happen and those are beyond our control.

# How do we collect your personal information?

We collect Personal Information about You in several ways including the following:

When you enter one of our competitions or prize draws;

When you complete one of our lifestyle questionnaires or surveys;

When you complete our unsubscribe form;

When we purchase or license your information from other suppliers;

When you are entering Personal Information onto Our website it is not until you click the submit button that Your Personal Information is transferred to us. Unfortunately, the internet is not a 100% secure medium and we cannot guarantee or accept any liability for any loss or damages in relation to information that you submit that is lost in transit. We also purchase &/or license Personal Information from other third parties. We call these third parties Data Contributors. Your Personal Information may be collected by Data Contributors if you have submitted information to a website, (for example when entering a prize draw), completed a telephone survey or lifestyle questionnaire or when buying goods and services from third parties. Regardless of the way Your Personal Information is collected Our Data Contributors warrant to us that you have consented to Your Personal Information being passed to us and that the consent is current. We call this permission Opt-In. We only ever work with Data Contributors that operate within Data Protection Law and are registered with the Ministry of Corporate Affairs at the time of purchase. You have the right under Data Protection Law to Opt-Out of receiving marketing material at any time and more information is shown about this in privacy notice

# **Legitimate Interest**

Under the Data Protection Act, we are also permitted to share some information with third parties who use

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such data for non-marketing purposes (including credit and risk assessment and management, identification and fraud prevention, debt collection and returning assets to you). This would include the data you provide to us today, at any time in the past and in the future.

#### Who Do We Share Your Information With?

Your data may be shared and combined with other companies who hold your personal data, and we may use information from other sources to add to data we already hold. This information may help us to improve our ability to service your needs on a personalized basis, by helping us to learn more about you and your purchasing habits and allowing us to let you know about offers you might be interested in. Your data may be used for data validation, enhancement, information verification, suppression, tracing and to the extent permitted by law, individual reference or lookup services, by Progressive sales and 3rd parties. Please remember that you can Opt-out at any time (see Opt-out below). Furthermore, you can request suppression of your details from progressive sales database if you would prefer us not to use your information for any of the above. You can also request to know what personal information progressive sales holds about you, by writing in person to us at the address below asking for a subject access request.

### **Marketing Services Providers**

Marketing Service Providers are companies who collect data from Data Controllers, such as ourselves, and help their clients tailor 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 organisations 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 wil share your data under strict licence terms with the Marketing Services Providers listed below, who like us, will use it to create products and services to help organisations better understand the likely characteristics of their customers; communicate with them more effectively; and find others like them across a range of marketing channel.

#### **Business Sectors**

When you Consent to us disclosing your personal information, those third parties who would wish to send you marketing communications or to advertise to you will fall into the following categories:

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Sectors	Description and examples
Retail	Automotive (including sales, accessories, rentals or repairs, warranty, Property, Tech, Hotels)
Finance	Pensions Investments and savings Funeral Plan Short /long term loans Mortgage/Housing loans
Insurance	Home Car Insurance Travel Pet Personal Medical

### **Other Agencies**

We collect your data and will share it with third parties. These organizations will have a relationship with you or it may used where they have a lawful reason, which may include these organization's own legitimate interest. Use includes tracing of individuals, verification and/or validation of the identity of individuals for the purposes of, but not limited to, anti-money laundering regulations, national security, crime prevention and Detection, anti-fraud processes, asset recovery and asset reunification. You have the right to object to this processing at any time by contacting us at <a href="mailto:puneet@progressivesales.co.uk">puneet@progressivesales.co.uk</a>.

Where permitted by data protection and privacy law, we may disclose information about you (including electronic such as IP addresses) and/or access your information:

- •If required or permitted to do so by law,
- If required to do so by any court, the Ministry of Justice, the Competition and Markets Authority or any other applicable regulatory, compliance, Governmental or law enforcement agency,
- If necessary, in connection with legal proceedings or potential legal proceedings, and/or In connection with the sale or potential sale of all or part of our business. If we reasonably believe false or inaccurate information has been provided and fraud is suspected, details may be passed to fraud prevention agencies to prevent fraud and money laundering.

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### **How Long Will We Retain Your Information For?**

The Act does not set out any specific minimum or maximum periods for retaining personal data. However, we will keep the personal data as long as it is necessary or as long as you want us to keep.

### Where We Store Your Personal Data?

The data that we collect from you is stored at a secure destination in the India and is processed by our staff or staff working for one of our partner suppliers. All information you provide to us is stored on secure servers from IBM. By submitting your personal data, you agree to the storing, processing and transfer of the data in accordance with this privacy policy. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

### Your right to withdraw

We respect your rights to your personal data. The GDPR provides the following rights for individuals:

- The right to be informed
- The right of access
- The right to rectification
- The right to erasure
- The right to restrict processing
- The right to data portability The right to object
- Rights in relation to automated decision making and profiling.

If you do not wish Progressive Sales, to use your personal data for direct marketing of goods and services, you have the right to withdraw your permission at any time and can unsubscribe in writing either by email to puneet@progressivesales.co.uk or by calling us directly at 01438 94 1075.

# **Cookies Policy**

When visiting progressivesales.co.uk, some information is collected automatically using cookies. Cookies are small text files that are placed on your computer or device by websites that you visit. They are widely used to allow sites to do things like provide personalized content and remember specific log-in details and settings. Cookies are used to make websites work, or work more efficiently, as well as to provide information to the owners of the site and so they can analyze how the website is being used. Cookies can be temporary or permanent. Most cookies are deleted as soon as you close your browser or mobile application - these are

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known as session cookies. Others, known as persistent cookies, are stored on your computer or device either until you delete them, or they expire.

The table below explains the cookies we use and why . utma (Unique visitor cookie) utmb (Session cookie) utmz (Campaign cookie) utmv (Visitor segmentation cookie) utmx (Google website optimizer cookie)

# How you can obtain data we hold about you?

You have the right to know what information we hold on our system about you at any given time. To obtain details of the information we hold as it relates specifically to you, you may contact Progressive sales, at Puneet @ progressivesales.co.uk or by calling us directly at 01438 94 1075. When contacting us to ascertain the information we hold about you, it would be helpful if you could provide us with details of your full name, address and contact details.

Compliance Department. Progressive sales, C-3/4 First floor, Rajouri Garden, New Delhi, India, 110027

Or via emails at Puneet @ progressivesales.co.uk or by calling us directly at 01438 94 1075.

If you have any questions, comments or concerns arising from the website, the privacy policy or any other relevant terms and conditions, policies and notices or the way in which we are handling your personal information please contact us. Progressive sales, reserves the right to change this Privacy Policy from time to time and without notice.

Signed: Puneer kang Position: Owner Date:01/04/2019

Next review date: 01/04/2020

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