

## Dawn Peak

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**From:** [REDACTED]@cpbuk.co.uk>  
**Sent:** 24 February 2020 12:21  
**To:** directmarketingcode  
**Cc:** [REDACTED]  
**Subject:** Objection to the draft Direct Marketing Code of Practice

External: This email originated outside the ICO.

Dear Sirs

Having read through the draft, I would offer the following observations.

I see the main thrust in the draft being one of protecting consumers which is to be applauded, although, as our company is solely B2B focussed, a lot of the document has no relevance to what we do. There are however some serious, potential implications for ourselves and other B2B based companies.

We are a marketing services company, founded in 1998, providing marketing support to Technology companies and we operate solely in the UK. A key element of our services is in providing contact data for marketing campaigns, be it "rented" for use on a single campaign or "purchased" for multiple use under a Licence Agreement. The contact data is captured by our in house team of telemarketers from information in the public domain (i.e. DueDil, LinkedIn etc) and from consent during campaign work. We offer clear opt-outs on emailing, adhere strictly to any suppression/deletion requests and provide such information to our clients so that they in turn can maintain compliance.

(As an aside, it may be of interest to note that from a database of around 90,000 UK based IT executives, we have had only 291 requests to be taken off our database and just 1 information access request in the 21 months since GDPR launched in May 2018!)

If we are no longer allowed to operate in this way it will:-

- a) Devastate our business, lead to a high number of redundancies and in all probability lead us to cease trading. We have 28 full time employees.
- b) Seriously restrict our clients ability to grow their businesses. If contact data is not going to be readily available from companies such as ourselves, this will inhibit the small IT suppliers in trying to compete with Global IT organisations with deep pockets and huge databases.
- c) Lead myself and many, many others to ask "Is this really necessary in the **B2B** community?".

We are therefore extremely nervous about the implications should the following sections of the draft be adopted in their current form:

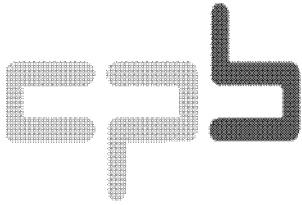
- 1) Indirect data collection (page 48)
- 2) Can we offer data broking services? (page 102)
- 3) And that in its' general terminology, the draft swings too far towards "Consent" being the de-facto standard for all direct marketing. This will be damaging to all B2B based organisations in the UK, let alone agencies such as ourselves.

I would therefore ask that some sensible adjustments are made to the draft.

Regards

[REDACTED]

Sent from [Mail](#) for Windows 10



Data



Telemarketing



Digital



Systems

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