

From: [REDACTED]@smartcall.com>
Sent: 16 January 2020 10:54
To: directmarketingcode
Subject: draft direct marketing code

Categories: Blue category

External: This email originated outside the ICO.

Having read this document a number of times I still think it's important to distinguish between direct marketing to individuals and direct marketing to companies. In a company where we have an individual's title, co email address, co tel# and name we believe in practice we are storing data about a company and the positions in that company rather than personal data about an individual.

As such we would contend that we are not processing personal data per se.

We think this draft code should cover this point specifically particularly if our understanding is not fully correct.

Commercial

Please note our address is now Unit 5

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