



Guidance on Direct Marketing at UCL

1. What is 'direct marketing'?

The term 'direct marketing' refers to the communication of advertising or marketing material which is directed to particular individuals.

This definition is wider than you might expect and covers any advertising, promotional or marketing material sent by UCL to a specific individual (who may be an employee of another organisation).

Direct marketing is not confined to communications sent in a commercial context, e.g. in relation to the provision of goods or services – it also includes promoting UCL's aims and objectives.

2. What is and is not covered by 'direct marketing'?


Within UCL, we talk in general terms about *internal marketing* (their experience as a student, not necessarily related to their activities) or *external marketing* (of a seminar on resilience or a careers event).

Or than in exceptional cases, communications to UCL staff do not amount to direct marketing.

But there are likely to be more circumstances in which communications sent to students could be direct marketing, in general communications to enrolled students and not amount to direct marketing. UCL staff members or enrolled students. Direct marketing at UCL is transparent in that marketing email sent to a generic email address like data-protection@ucl.ac.uk

3. What direct marketing includes to individuals who previously expressed an interest in a particular UCL course, or who have applied unsuccessfully for a similar course;

- Promoting UCL events, such as lectures or courses, externally;

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- Targeted marketing to professionals for courses or invites to events relevant to their current employment;
 - Fundraising; and
 - Marketing additional programmes to alumni.

This marketing takes many forms, e.g. via SMS, email, social media and post.


4. What rules apply to UCL's direct marketing activities?

The main pieces of legislation currently governing UCL's direct marketing activities are:

- **Data protection rules:** the General Data Protection Regulation (**GDPR**) and the UK Data Protection Act 2018 (**DPA 2018**); and
- **Marketing specific rules:** the UK Privacy and Electronic Communications Regulations (**PECR**).

The GDPR and DPA 2018 govern how you may process personal data such as names, contact details and any other information (h6.4 (m)-2e0 Tw uBDCPe-12.2 (8.9 (at)-1.1 (0 Tw 4(o)-12.2ef1 (0 Tw T0 Tc 0



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- **Accuracy:** personal data used for marketing purposes, e.g. marketing lists, should be kept accurate and up to date;
 - **Storage limitation:** if you collect personal data for marketing reasons then you cannot keep it indefinitely – you will need to consider how long UCL actually needs to retain that information for. Please see UCL's Records Retention Schedule [here](#) for further information on retention periods; and
 - **Integrity and confidentiality:** personal data, including where it is collected for marketing purposes, must be kept securely on UCL systems. Please see UCL's Information Security Policy [here](#) and our Data Protection Policy [here](#) for further information on holding personal data securely.

d) Comply with individuals' rights under data protection laws

Individuals may object to the use of their personal data for direct marketing purposes under current data protection laws.

If an individual exercises their right under the GDPR to object to the use of their personal data for marketing purposes (rather than simply opting out of receiving marketing communications), you must inform UCL's data protection team as soon as possible at data-protection@ucl.ac.uk and UCL will be obliged to stop processing the individual's personal data for marketing purposes. UCL's data protection team will help you to put appropriate measures in place to ensure that the request is complied with.

6. What additional steps do I need to take for specific types of direct marketing?

There are additional steps you need to take where you carry out direct marketing by:

- Post;
- Electronic means (for example, email or text);
- Live telephone calls;
- Automated telephonic calls

a) Electronic marketing (e.g. by email or text)

Individual subscribers only

You must not send electronic marketing communications to



Both individual subscribers and corporate subscribers

You must always say who is calling, allow UCL's number (or an alternative contact number) to be displayed to the person receiving the call, and provide a contact address or freephone number if asked. It is also good practice to explain to the individual where they can find a copy of the relevant UCL privacy notice.

c) Marketing by post

You must not make unsolicited live marketing calls to anyone who has informed UCL that they do not wish to receive our postal marketing.

You should also

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