

Data Sharing Review
Richard Thomas and Mark Walport
Issued 11 June 2008

Mike Bradford, Director of Regulatory and Consumer Affairs at Experian says:

"We welcome the Data Sharing Review report and we believe that it sends a clear signal to both private and public sector organisations that good data protection is sacrosanct. Any responsible custodian of data should welcome the increased focus on accountability and enforcement."

"We believe that the report's recommendation for the withdrawal of sale of the edited electoral register needs to be re-considered and debated fully. Whilst it is only a recommendation at this stage, broader context needs to be provided as there are underlying implications for the people it is trying to benefit."

"At the heart of the matter, as long as there is total clarity of purpose and freedom of choice around how personal information is used and the consumer is totally aware of the consequences of their decision, the consumer should be empowered to make that decision for themselves. It is important to recognise that the edited electoral register provides consumers with the right to exercise choice in a wholly transparent fashion. Ultimately, consumers are dictating whether or not they want their data used for 'commercial purposes'."

The edited electoral register's broader application:

"The edited electoral register is not just used in direct marketing and the recommendation for its withdrawal from should recognise this important fact. It has a far broader application. For example, the data is used to protect consumers from fraud, in particular when transacting on-line, and also helps lenders in the customer management process. It is also a key element in many legitimate and 'public interest' processes such as vetting applicants for jobs and tracing absconded debtors. These important aspects also need to be factored in and tabled for further discussion."

Direct marketing application:

"The credit industry, alongside numerous other sectors, uses edited electoral register data to improve targeting and data quality – with transparency at the point of collection. The data set is a core component for these marketing activities, enabling companies to be more competitive in tougher market conditions and create tailored offers to elicit the best response. The data is also used to remove names from marketing lists where it is clear the individual has moved from the address since the list was created - helping responsible marketers to keep their data accurate and up-to-date, eliminate waste and avoid people receiving mail for a previous occupier."

"As these points highlight, the edited electoral register's use for 'commercial' purposes is not detrimental to the consumer and - subject to transparency and freedom of choice – the consumer can benefit from the uses of their personal information."

Privacy:

"Good privacy – and achieving commercial success through consumer confidence should aim for a sensible balance. I would argue that the UK regulatory environment is conducive to this with a pragmatic balance between public interest and consumer empowerment and education. In other EU markets we see highly

paternalistic regimes where the overriding philosophy is privacy for privacy's sake – and this works against the consumer's interests."

"Good privacy should – and can – protect and enable the consumer and citizen; encourage micro and macro economic growth and prosperity; protect and improve the trading position of UK plc in the face of global, European and emerging market competition; broaden the effective and trusted application of data, particularly in central and local government and across the public sector at large."