

# Lead Fidelity Certificate



## LOGOIPSUM Limited

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<b>Business units / Brands Certified</b>	Logoipsum Advertisting, Logoipsum Technology
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<b>Regions certified</b>	United Kingdom, France, Germany
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<b>Month of certification</b>	May, 2021
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## Principle

## How applicant complies.

1

### Code of Conduct:

The supplier will have signed the LFC code of conduct.

2

### Lawful processing of data:

Consent Practices should be consistent with the standards set out by the ICO or local regulatory governing body. Particular attention should be given to:

Having an 'unambiguous' consent policy – meaning that all data subjects will be clear that their data is being captured and shared. Consent should be specific, concise and should offer options to consent separately to different purposes and types of processing. The requirement for consent to be given with a positive opt-in. (i.e suppliers should not use pre-ticked boxes or any other method of default consent).

The minimum requirement for proof of consent– date, time and URL of consent.

3

### Subcontracting and Affiliate Networks:

Subcontracted suppliers should be held to the same standard that the supplier is held to through robust T&Cs .

All subcontractors should have been vetted and the supplier should review the practices of their affiliate network at least annually. In the event of a data access

or right to be forgotten request, suppliers should be willing and able to tell clients which suppliers they have subcontracted.

When a data access request, right to be forgotten or a data challenge / rejection is received from a client, suppliers must be able to trace and enforce the request through their supplier network. Consent should be specific, concise and should offer options to consent separately to different purposes and types of processing. Any purchasers or controllers (including intermediaries) who will be relying on the consent gathered by the subcontractor / affiliate.

**Exclusivity and data resale:**

Suppliers should be open and transparent with purchasers about when leads & records are sold to multiple purchasers.

4

All leads, including those sold to multiple purchasers must have explicit consent for the data to be shared with the purchaser. If an advertiser requires a supplier to exclude or deactivate a record from future campaigns for a period that should be included in trading terms.

**Compliance:**

Suppliers will have a robust, documented and up to date GDPR policy (see 2).

Suppliers will have a named Data Protection Officer and a documented issue resolution process. Lead data will be gathered using visible, clear, understandable terms and conditions.

5

The supplier will have a record of any ICO investigations and will make them available to auditors upon request. In the event of a new ICO investigation the supplier will immediately inform the LFC chair.

Data privacy training is mandatory for all our staff involved in collecting or processing personal data.

**Data Validation:**

When the purchaser requires it, the supplier must be willing to have their data processed by one or more data validation platforms.

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The LFC will promote the use of data validation platforms which can demonstrate they meet the required level of data security. Members of the LFC must be willing to use any data validation platform that has been selected by the purchaser, unless they can evidence regulatory, security or compliance concerns.

## Statement of verification partner

We have reviewed {the applicants} policies and procedures in accordance with the Fidelity Consortium standards. Our enquiries were designed to independently confirm that {the applicants} policies and practise meet the standards defined by the fidelity consortium. Our review included limited testing of the processes and controls for implementing their policies.

In our opinion, at the time of review {the applicant} has established policies and implemented practises that uphold the Fidelity Consortium standards.

**Verified By:**

Address :

### About the Fidelity Consortium:

The lead fidelity consortium defines standards and best practise for trading data in the lead generation industry. Our aim is to deliver trust and confidence to lead buyers by certifying data suppliers through and independent audit.

The organisation comprises suppliers, marketing agencies, technology providers and buyers.

For more information visit [www.fidelityconsortium.com](http://www.fidelityconsortium.com)