

PRIVACY AND ELECTRONIC COMMUNICATION (EC DIRECTIVE) REGULATIONS 2003

UNDERTAKING

British Red Cross
44 Moorfields, London EC2Y 9AL

I, Michael Adamson, Chief Executive of the British Red Cross, for and on behalf of the British Red Cross hereby acknowledge the details set out below and undertake to comply with the terms of the following Undertaking:

1. The Privacy and Electronic Communications (EC Directive) Regulations 2003 ("Regulations") as amended by the Privacy and Electronic Communications (EC Directive) (Amendment) Regulations 2004 and 2011, came into force on 11 December 2003.
2. Following an article published in the Daily Mail on 7 July 2015 ("article"), the Commissioner launched an investigation into the direct marketing practices of the charity sector.
3. The Information Commissioner's Office ("ICO") contacted the charities referred to in the article, including the British Red Cross.
4. The British Red Cross provided details of its relationship with call centres it uses, its direct marketing policies and procedures, staff training and responses to specific points raised by the ICO following the article.
5. The British Red Cross confirmed (amongst other things) that it does not sell personal data to third party organisations. In May 2015, the British Red Cross took the decision not to exchange individuals' data with other charities.
6. The Information Commissioner has considered the British Red Cross's compliance with the Regulations in this matter. The relevant Regulation is Regulation 21. In the circumstances the British Red Cross has agreed to undertake as follows:

The British Red Cross shall, as from the date of this Undertaking and for so long as similar standards are required by the Regulations or other successor legislation, ensure that it complies with Regulation 21 and, in particular:

- (1) Implement an "opt-in" consent model for live telephone marketing calls no later than 12 months from the date of this Undertaking. "Opt in" shall mean consent given by a clear affirmative action establishing a freely given, specific, informed and unambiguous indication of an individual's agreement to personal data relating to them being processed in this way.

- (2) Ensure that any consented data referred to in paragraph (1) above will be subject to a 24 month expiration period, in line with its business needs. After which time, the British Red Cross will only make live telephone marketing calls upon gathering fresh, specific and informed consent from the individual.

Signed:
[Name of Chief Executive/Director]
For and on Behalf of the British Red Cross

Dated:

Signed:
Stephen Eckersley
Head of Enforcement
For and on behalf of the Information Commissioner

Dated: