

Why a Factory Screening is GDPR compliant

History / Background

A Factory screening used to work by **matching** a client dataset against an in-house dataset of wealthy individuals. But after an analysis of our data processing activities and a full **Privacy Impact Assessment** on each of our services, we decided to **delete** our in-house dataset.

This was mainly because we judged that the **data privacy risks** inherent in maintaining the database were difficult to balance with the **rights** of the data subjects. We weren't just risking Factory's **reputation** but also, if we judged that the data was not obtained in a **fair** and **transparent** manner, putting our clients at risk.

So in early 2017, supported by the ICO, we planned a new system.

Our new Screening process

Our new screening process no longer **matches** a client dataset against a **finite number** of potentially wealthy individuals.

Instead, we have gathered of a wide variety of **non-personal data** to design our own combination of scores and data points so we can **prioritise** your database. This **non-personal data** (which cannot be used to identify an individual, either directly or indirectly) includes **socio-** and **geo-demographic data** based on **postcode**, and data pertaining to **charitable** or **professional affiliations** or **entities**. Prioritising your dataset will help identify those with the likely **capacity**, **affluence** and **affinity** to become **major donor prospects**.

Further information

We no longer hold a dataset comprised of the personal data of wealthy individuals who are unaware this is happening.

We do not keep data longer than is necessary and all original client data is destroyed at most three months after the completion of a project (or sooner if requested).

We ensure that our clients are GDPR-compliant prior to undertaking a screening (e.g. by ensuring they have chosen a lawful basis for processing data for this purpose, that they have provided their supporters with fair processing information explaining what wealth screening is and have either obtained consent or given them a clear option to opt out of their data being used in this process (if relying on legitimate interests).

We provide safe, secure methods of data transfer and storage (via UK based servers).

We do not use client data other than for the purposes of carrying out screenings.

We do not share or sell data that is provided to us for screening.

Please see our [Guide to a Compliant Screening](#), our white paper '[Prospect Research and Legitimate Interests](#)' and the [Screening page](#) of our website for more information.

If you'd like to discuss a screening with us, or to ask any questions, please email research@factory.com.