

From: [REDACTED]@newcastle.co.uk>
Sent: 04 March 2020 10:31
To: directmarketingcode
Subject: Direct marketing code of practice - Draft code for consultation

External: This email originated outside the ICO.
Hi there

I have reviewed the above and cannot see any reference to communications between employers and their employees.

It would be good to understand the ICO's expectation of how organisations should interact with their employees in respect of the services/products they offer bearing in mind the difficulties around consent as a legal basis for processing in an employee/employer context. It is common for businesses to offer their employees discounts on the products/services they offer as a benefit of employment. How should employer's communicate such benefits to their employees? For example, can an employer send an internal communication by email to its employees about the services/products they can receive as benefits at discounted rates or would this be deemed as direct marketing under PECR for which consent is required.

Clear guidance on the above would be extremely helpful as email is the most practical way for employers to communicate with employees in large organisations where employees may be located at numerous sites/locations.

Thanks



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