

# Ethical Marketing Policy

## Policy statement

At Groundsure, our marketing team has made an absolute commitment to honesty and transparency with our campaigns, client communications and through our resellers and data partners about our products and services.

This includes being clear, honest and open in our:

- Email marketing communications
- Digital banner advertising
- Copywriting, including articles, blogs and white papers
- Reseller training and marketing programmes
- Integration of data partners' content
- Management of competition prize draws
- Guidance and advice to clients, wider stakeholders and communities
- Treatment of customer data in compliance with our privacy policy.
- Development of SEO and PPC advertising so that it provides valuable and useful content that aligns with what users and search algorithms are looking for.

We will not:

- Email someone who has not already opted-in to receive marketing communications, save for where there is a legitimate interest to maintain and manage our mailing list (one time cleanse, etc) under the terms of our existing group privacy policy and prevailing legislation including GDPR.
- Use data and information in any of our communications that does not have a proven, verifiable and trusted source.
- Sell on, manage or share any of our customer data that is in contravention of our group privacy policy or ICO compliance standards
- Provide misleading, inaccurate, or unverifiable information in any of our advertising that contravenes prevailing Advertising Standards Authority or Sale of Goods Act rules, Institute of Direct Marketing standards, etc.

When developing our campaigns and forward strategy, we will discuss as a team whether any of the proposed activities could be considered unethical and to sense check and sign off that this is not the case before proceeding.

These kinds of questions will centre around: accuracy of statements, use of imagery and mis- or under-representation of communities, groups, races, genders and orientations, use of data and target groups, implications for data partners, resellers and other stakeholders. In all cases, we will ask ourselves whether we are exaggerating the claims made in any of our communications and campaigns before release to ensure compliance, together with a formal sign off.

Where a campaign includes any form of incentive prize draw, we will ensure that the draw is undertaken in a fully transparent manner using a random number generator to avoid any form of bias, with the number selected being the winner without exception. Where we source and procure branded merchandise and giveaways for events, we will ensure that we always review and screen potential suppliers on their sustainability in terms of use of recycled or low carbon or natural materials.

We make a commitment to be open and transparent about our social and environmental impact. We will ensure that all of our campaigns do not take part in “green or impact washing” or misleading our audiences about our environmental footprint, impact to the environment in which we operate or the degree to which we resolve that footprint. This will include transparency on how we offset, the work that we do to support our communities, including disadvantaged or underrepresented groups and the role that our data and services have in advising on and mitigating environmental impacts.

As a rule, we will put the user first and focus on the clear benefits, guidance and value in our content, support and services that aligns with our company mission and vision. We will not “buy” influence, such as fake social media followers or links to improve our SEO or digital footprint.

Technology moves on at pace and we commit to adapt and flex our ethical marketing policy as legislation, standards, and safe practice dictates. Our specialists within our team will keep in touch with changes in best practice, standards and prevailing legislation through formal training, online user groups and networking.

We will also encourage our audience and users to reach out and engage with us on what kinds of content they want to receive and to ensure that it is always as relevant and tailored as possible.

This Document is owned and maintained by Groundsure Marketing. The effectiveness of this policy will be reviewed annually or on significant organisation or legislative changes.

Version	Date	Notes/Changes Reviewed by
2.0	16.12.2024	Nicola Weaver, HR
1.0	11.05.2022	Paul Mee, HR