

# The Guide to Data Suppression

**What the  
ICO has to  
say about  
Deceased  
Data  
Suppression**

**Common  
Misconceptions  
about GDPR  
and Deceased  
Data  
Suppression**

**Benefits of  
Suppressing  
your Data**

**How to  
Evaluate your  
Deceased Data  
Suppression  
Processes /  
Strategies**

**Deceased  
Suppression  
Data  
Evaluation**

# Contents

- 1 Introduction**
- 2 What the ICO has to say about deceased data suppression**
- 3 Common Misconceptions about GDPR and Deceased Data Suppression**
- 4**
- 5 Benefits of Suppressing your Data**
- 6 How to Evaluate your Deceased Data Suppression Processes / Strategies**
- 7**
- 8**
- 9 Deceased Suppression Data Evaluation**
- 10 Conclusion**
- 11 Frequently Asked Questions**
- 12**
- 13 About The Ark**

# Introduction

The **General Data Protection Regulation (GDPR)** came into force on 25 May 2018 giving the consumer greater control over their personal data and making businesses accountable for proving adherence to the stringent legislation on data management and security.

**All organisations are now legally required to ensure that their personal data is up-to-date and accurate and to demonstrate compliance with these principles by carrying out internal data audits and reporting any data breaches within 72 hours.**

Data decays at an alarming rate (due to deaths, marriages and house moves for example) presenting UK businesses with a considerable challenge to uphold GDPR requirements. It's not surprising that a customer database that is not well maintained will decay at a rate as high as 30% per annum.

Another complicating factor is that many organisations are still failing to check for deceased records in their data, believing that the legislation does not apply to them or that their internal processes will adequately meet compliance requirements. Such misconceptions about what constitutes effective deceased suppression and what data needs to be suppressed in the light of the GDPR put businesses at risk of breaching the Regulation and of leaving themselves open to associated penal fines, let alone the potential distress and opportunity for fraud caused by mailing customers who have passed away.

Let us help address some of the confusion so that you can find the right suppression solution for your data and stay GDPR compliant. This guide includes helpful tips and checklists and a FAQ's factsheet to help make file selection simple.

We hope you find it useful.

## The Ark Team

The Data Quality Specialists

# What the ICO has to say about Deceased Data Suppression

The Information Commissioner's Office (ICO) have provided us with some guidance as follows:

**Deceased individuals do not fall under the scope of GDPR or DPA 2018,** however, there's still a duty of confidentiality afforded to deceased individuals and therefore organisations need to consider if it's appropriate to retain these records or if to destroy them as they are no longer required... There may be some justification in retaining certain records of the deceased but that should be on case by case basis and on either a legal or legitimate basis to ensure compliance with other legislation.

**If they are not checking information is accurate and up to date where 'necessary' they may not be compliant...** **Chapter 2, Article 5** relates to accountability and for organisations to demonstrate this, they need processes in place to show what they are doing with the data they hold and why they hold it.

**The Information Commissioner's Office (ICO)  
December 2018**

# Common Misconceptions about GDPR and Deceased Data Suppression

The GDPR's requirements regarding data accuracy are crystal clear.

**Chapter 2, Article 5: 'Principles relating to processing of personal data'**

Personal data shall be: 1d) accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay ('accuracy').

Holding records of deceased customers is completely at odds with these principles. With the threat of a financial penalty hanging over them for non-compliance why are many organisations still failing to suppress their data?

The following common misconceptions about data suppression and GDPR mean that some businesses are in danger of not adhering to the terms of the legislation...

**THE GDPR DOES NOT APPLY TO DECEASED CUSTOMERS**

It is true that deceased individuals do not fall under the scope of the GDPR but the legislation does require all personal data to be up-to-date and accurate and perhaps more importantly that organisations demonstrate accountability. Personal information should not be kept for longer than the purpose for which it was originally acquired. **The Information Commissioner’s Office (ICO) advises that “there’s still a duty of confidentiality afforded to deceased individuals and therefore organisations need to consider if it’s appropriate to retain these records or if to destroy them as they are no longer required.”**

Any customer database which contains records of deceased individuals for no specific purpose cannot claim to be accurate or up-to-date and risks breaching the terms of the Regulation. **“Chapter 2, Article 5 relates to accountability and for organisations to demonstrate this, they need processes in place to show what they are doing with the data they hold and why they hold it.”** In short, if the data is no longer needed, why still keep it and without checking how will you ever know how many customers on your database are deceased?

**CUSTOMERS FAMILY MEMBERS WILL NOTIFY US OF CLIENT DEATHS**

Some organisations rely solely on deceased customer notifications, but this strategy will not meet compliance requirements as not all deaths are notified in this way.

**DATA SUPPRESSION IS ONLY REQUIRED IF I SEND DIRECT MAIL TO MY CUSTOMERS**

Some businesses mistakenly believe that suppression is only required if they mail their customers. But just because customer data isn’t regularly mailed, it doesn’t mean it is not subject to regulatory controls. All data processed, including data that is just stored, must be kept accurate.

**DATA SUPPRESSION IS A ONE-OFF ACTIVITY**

Data changes rapidly, approximately 50,000 individuals will pass away every month. That’s equivalent to 1% of the population. It’s clear that a one-off data suppression will not adequately deal with these continual updates and that a regular deceased suppression process needs to be put in place.

**...there’s still a duty of confidentiality afforded to deceased individuals and therefore organisations need to consider if it’s appropriate to retain these records or if to destroy them as they are no longer required.**

**Chapter 2, Article 5 relates to accountability and for organisations to demonstrate this, they need processes in place to show what they are doing with the data they hold and why they hold it.**

# Benefits of Suppressing your Data

Having addressed some common misconceptions about deceased data suppression let's now consider the potential benefits to your organisation of implementing an effective deceased suppression strategy.

## **AVOID PENAL REPERCUSSIONS OF NON-COMPLIANCE**

Under the GDPR holding deceased contacts on your database for no justifiable purpose risks your records being deemed inaccurate or out-of-date. This could constitute a technical breach of the Regulation and incur penalties of 2% of global turnover or €10 million, whichever is greater.

## **MINIMISE RISK OF IDENTITY FRAUD**

Research from The Office of National Statistics estimates that up to 110 items of mail can be sent to a deceased individual in the 12 months after their death. This increases the risk of identity fraud as criminals intercept mail and use the documents to apply for products in the name of the deceased customer. Identity fraud is the fastest growing crime in the UK and costs circa £5.4bn a year.

## **PROTECT YOUR BRAND**

Continuing to mail a contact who is deceased will be highly distressing to family members. The result is potential damage to your brand's reputation. By failing to invest a small amount of time and money to ensure your database is up-to-date and accurate you risk appearing as an organisation that does not care enough about its customers.

## **IMPROVE YOUR RETURNS ON INVESTMENT**

Mailing deceased contacts is a waste of your company resources. By using data suppression services to remove or flag these contacts you minimise wastage and your return on each campaign will be higher as the cost of suppressing your data is cheaper than the cost to mail it.

## **DO YOUR BIT FOR THE ENVIRONMENT**

Printing and sending out mail to non-existent contacts will have a negative impact on not just your organisation's resources but also on the environment's resources. Help keep carbon emissions down by only mailing to an accurate database.

# How to Evaluate your Deceased Suppression Processes / Strategies

When evaluating suppression files we recommend you consider the following four key elements;

Accuracy



Recency



Coverage



Size

## WHY EVALUATION IS KEY...

Some organisations believe that all deceased suppression files are the same. If they have a solution in place, they will assume it identifies all their deceased customers and therefore will not see the need to evaluate their strategy. This is the reason most often cited by data professionals for the lack of a regular review. Deceased suppression files may change over time as each product is made up of multiple data sources and so relying on the same provider year after year without review is a flawed strategy. The make-up of your chosen suppression file may contain very different data today than when it was first licenced.

Relying on older legacy deceased suppression files may no longer be good enough to maintain GDPR compliance if the solution does not identify all known deceased records. A regular review will not only ensure that your suppression strategy is effective, it also demonstrates compliance - being able to show to the regulator that best efforts have been made to meet the demands of GDPR is not only best practice, it also reduces risk. You might be surprised to learn that there is a huge difference between the performance of the market leading files. For example, **The Ark's National Deceased Register file regularly identifies in excess of 30% unique deceased matches** over and above other deceased suppression files in the market. Another common misconception is that biggest is best and that file size is a clear indicator of effectiveness. This is simply not true.

Finally, a regular review of deceased suppression providers will give you the opportunity to check whether you are paying more than you need to.

When evaluating suppression files we recommend you consider the following four key elements; Accuracy, Recency, Coverage and Size.



## DATA ACCURACY

Using inaccurate suppression data puts your business at risk of deleting customer records unnecessarily and incurring additional costs.

We advise that you investigate how each suppression file owner compiles their file. No suppression file will be completely free of errors but understanding the provenance of the data will help you make more informed purchasing decisions. For example, volunteered data such as a deceased notified by a family member is open to human error whereas data provided by FCA regulated organisations with stringent validation processes in place will be more robust.

The best way to assess accuracy is to screen a sample of your known active and deceased customer data to check if the file correctly identifies each category. The results will show if the file is over or under suppressing. For example, if someone has recently responded to a campaign but a suppression file believes they are deceased further investigation is required.

Care is needed here - it doesn't necessarily mean the suppression data is inaccurate. For example, family members may assume the identity of a deceased person so they can carry on ordering through their account. This would generate a suppression on the suppression file but an active customer in your database. However, these numbers should be relatively small. If you identify large numbers then it's likely the file is inaccurate and / or you need to check that your suppression match processing is working as expected (e.g. individual rather than household level).

Some suppression file suppliers will use 'confidence levels' to highlight the level of certainty of a record on the file being deceased. However, The Ark do not advocate this approach and instead only add records to our files after multi-source validation that ensures their accuracy. We believe if a person appears on a suppression file they should be deceased, and not a 'maybe'.

## DATA RECENCY AND COVERAGE

The recency and coverage of suppression data are two other important factors to consider when choosing a suppression file. Always ask your supplier how often the file is updated and how recent are the latest additions. A common mistake when interpreting results from a suppression evaluation can be focusing on the overall number of matches, however it's equally as important to check how well a suppression file identifies those who have recently passed away. If a suppression file is only capable of identifying deaths that happened months or years ago it really isn't fit for purpose in our opinion. **The Ark's National Deceased Register** performs better than any other file on recent data, capturing over 90% of all UK deaths, most within 6 weeks of death occurring. Suppression data that is months or years old will not keep your data accurate.

File coverage is also a key consideration. Remember to check if the files you are evaluating collect data from the whole of the UK and across all demographics (for example age and income). Choosing a file with poor coverage will limit your ability to identify inaccurate customer data. Only a thorough evaluation will enable you to understand these dynamics.

**The Ark's National Deceased Register** performs better than any other file on recent data, capturing over 90% of all UK deaths, most within 6 weeks of death occurring.



## FILE SIZE

Finally, when considering overall suppression file size, bigger isn't always better. File sizes from the three leading providers of suppression data vary greatly. But how is this possible when the number of deaths occurring each year is an absolute? The answer lies in the way in which the files are created. Although all the leading providers' files have a level of data overlap, they contain different data sources that have been collected and verified in different ways. Each file will contain unique data that will never be found on any other file. Some files include much older data, such as records dating back to the mid-1980s, and some include data with confidence level scores. All these factors will affect the total file volume.

**The Ark's National Deceased Register only includes deceased records with a confidence level of 100% and only those deaths notified from 2001 onwards** (we believe very few organisations will not have already identified customers who passed away before this date). Suppression files that include large volumes of older deceased records are just playing a numbers game.

File size in isolation is not an indicator of performance. When considering file size, it's important to understand the data's age, uniqueness and coverage and most importantly how well it works in identifying deceased customers on your data.

## Case Study

One of the UK's largest insurers used **The Ark's National Deceased Register** suppression file and found its customer database contained over 89,000 deceased individuals on a database containing 22 million records. This worryingly large number of deceased records had gone undetected by all the other suppression files it had relied upon for decades to keep its data up-to-date, clean and compliant. **The Ark's National Deceased Register** is certainly not the largest file in the market, however this case study clearly demonstrates that its unique data delivers a highly effective suppression service that outperforms larger competitor files.

## Data Audit Checklist

### Data sources

- What sources are used to create the suppression file?
- Do they provide full coverage of the UK or are there 'blind-spots' in their data?
- Are they robust and do you understand the data provenance?
- Are they sustainable?
- Are the suppression files collected in a GDPR compliant manner and can this be evidenced?

### Data Accuracy

- Is the data derived or volunteered?
- How has the data been verified, against which data sources and types?
- How accurate are the matches? Check against your database to see whether you agree with the results of the screening exercise and question anything that doesn't look right

### Update frequency

- How often are the files updated - monthly / weekly / daily / other?
- What percentage of the overall number of matches does each suppression file identify? (This can be useful to identify the weaker files and narrow down the choice to one or more of the strongest performing files.)

### Price

- What cost options are available?
- Will it be more cost effective to license a file annually rather than paying on a cost per match basis?
- How flexible are the terms of the license agreement?
- Are there penalties if you decide to terminate the license agreement?

### Case studies

- Can the data owner provide any reference clients or case studies?

# Deceased Suppression Data Evaluation

The **Ark's National Deceased Register** file has been evaluated by all the major MSPs and bureaux in the country all have confirmed the accuracy of our data and its uniqueness.

However, to provide further corroboration of our files performance The Ark commissioned an independent bureau to carry out a live test of the three main deceased files in the market.

Two extracts were evaluated which included a customer database and a campaign mailing file. The bureau was asked to match both the customer database and the mailing files separately against each of the deceased suppression files. Each of the matches were run independently i.e. no hierarchies were involved and the same matching criteria was used for each. The results of this test are shown in the tables below.

## OVERALL DECEASED SUPPRESSION MATCHES BY SOURCE

Research was undertaken January 2019

### CUSTOMER DATABASE OF 1,050,000 RECORDS

Rank by volume of matched		Industry Suppression File	Volume of records input	Gross volume of records matched	% of records matches
1	<b>The Ark</b>	National Deceased Register (NDR)	<b>1,050,000</b>	9,793	<b>0.93%</b>
2	<b>Wilmington Millennium</b>	Mortascreen*	<b>1,050,000</b>	6,484	<b>0.62%</b>
3	<b>The REaD Group*</b>	The Bereavement Register (TBR)	<b>1,050,000</b>	5,804	<b>0.55%</b>

### CAMPAIGN MAILING FILE OF 200,000 RECORDS

Rank by volume of matched		Industry Suppression File	Volume of records input	Gross volume of records matched	% of records matches
1	<b>The Ark</b>	National Deceased Register (NDR)	<b>200,000</b>	593	<b>0.30%</b>
2	<b>The REaD Group*</b>	The Bereavement Register (TBR)	<b>200,000</b>	529	<b>0.26%</b>
3	<b>Wilmington Millennium</b>	Mortascreen*	<b>200,000</b>	440	<b>0.22%</b>

\*The Bereavement Register is a registered trademark of the Read Group Limited and Mortascreen TM is a registered trademark of Smee & Ford Limited and neither have any association or connection with The Ark or the National Deceased Register.

# Conclusion

Navigating data suppression in the wake of the GDPR is proving a challenge for many organisations with misconceptions at large about what data needs to be suppressed and when. **The ICO advises that if you have no specific and justifiable purpose for continuing to hold deceased or goneaway data you could find yourself in breach of the legislation.** Now is the time to evaluate your current data suppression processes to ensure you have a robust data suppression strategy in place to keep your data up-to-date and accurate. Choosing the right file or combination of files will be the key to success.

As the previous table (page 10) shows, The Ark identified a higher number of deceased records in both the customer database and campaign mailing file than either of the other two providers. It is clear to see that **The Ark's National Deceased Register** contains a considerable volume of unique records not available in other files. Organisations not already using the **National Deceased Register** may therefore fail to properly identify all the deceased customers on their databases which could have a direct impact on their ability to de-risk their businesses and comply with GDPR. Suppression file size should not be used in isolation when evaluating suppression products. The data sources used, validation methods, confidence levels, unique data and coverage of each file will all impact on a file's effectiveness. Based on the results of this evaluation we would encourage organisations to evaluate their own data. The only true test of effectiveness is to evaluate all the market suppression files against the customer database. This will deliver fact-based results upon which to measure file performance.

Now is the time to evaluate your current data suppression processes to ensure you have a robust data suppression strategy in place to keep your data up-to-date and accurate

To evaluate your data please contact the Ark on **0370 334 1510** or email us **[2by2@ark-data.co.uk](mailto:2by2@ark-data.co.uk)**

# Frequently Asked Questions

## **Is data suppression a key component of GDPR?**

Keeping personal data accurate and up-to-date, and deleting or rectifying inaccurate data, is a compliance requirement, not a nice to have.

## **How frequently should I review my suppression data?**

We recommend at least once every 3 years. Data files change as data sources enter and exit the market. If you've been using the same file for several years it may contain very different data today, than when it was first licensed. And that may mean it's no longer effectively removing your deceased customer data.

## **What customer (and prospect) data needs to be suppressed?**

This decision should be made at an enterprise rather than department level to ensure a consistent compliant strategy. Remember though that GDPR requires all companies to hold only accurate and up-to-date information and so if you have no specific and justifiable reason for keeping data it should be suppressed.

## **Why do I need to evaluate my suppression data?**

A regular review process is required to ensure that your solution continues to deliver the most effective removal of deceased data. The make-up and content of some files changes over time and new suppression files come on to the market every so often. An evaluation also provides an audit trail and demonstrates your commitment to data quality. After all, a lack of awareness of how your suppression strategy is performing is unlikely to be accepted as an adequate excuse for holding inaccurate data.

## **Can I rely on returned mail to keep my database up-to-date?**

Some businesses send direct mail to their customers and action any returns received. We would advise against this strategy for several reasons; the company will only ever receive returned mail for a small percentage of customers, the costs to mail a customer will far exceed those to suppress them and mailing a customer who is deceased exposes both parties to the risk of fraud taking place.

## **Are all suppression files the same?**

No they are not. There will be a percentage of data that is common to all suppression files. It's important for you to identify which files have the highest levels of unique data that match your database. You can then choose the best suppression file or combination of files to keep your data clean and compliant.

# Frequently Asked Questions

## continued

### **Do I need more than one suppression file?**

This will depend on your data, however relying on a single suppression file rarely identifies all known deceaseds and almost certainly will mean your database will contain inaccuracies. An evaluation is the only way to test how clean your data is and identify which combination of suppression files is right for your business.

### **My data suppression strategy is managed by our data partner – should I rely on them to implement the right suppression?**

The GDPR requires organisations and individuals to understand what data is being held and how and why it is being processed. The person responsible for data quality and accuracy within your organisation (usually the DCO) needs to understand in detail why a certain suppression strategy is being used, how the decision to use that strategy was arrived at and when it was last reviewed. Ignorance is not an acceptable excuse.

### **How do I evaluate the suppression service that is provided by my agency?**

Most agencies will be happy to audit your customer data against the full range of files available, even if they are not currently used on your data, and typically there would be no charge to do so. They will share the results, so you can identify any 'gaps' and if necessary renegotiate licence fees or costs per match in line with the results of the review.

### **My business is digital, do I need suppression?**

If your business holds or processes personal data you still have a legal requirement to keep it up-to-date and correct inaccuracies.

# About The Ark

The Ark is one of the UK's leading specialists in data quality. It helps both large and small organisations maintain their databases to the highest possible standards, enabling them to realise the full potential of data-driven marketing, combat identity fraud and comply with data governance regulations such as the GDPR.

Since 2003, The Ark has pioneered the development of suppression software tools that flag records of deceased customers and update those of home-movers. The **National Deceased Register** (NDR) and Re-Mover goneaway suppression files are widely regarded as the most comprehensive, up-to-date and accurate on the market. We are dedicated to bringing further enhancements and innovation to suppression services. For instance, and based on GDPR guidelines, The Ark has invested heavily in APIs to make it easy for companies to access our suppression files as well as a full range of full data processing services to assist companies both large and small. For more information on our data processing products please give us a call.

Many organisations, across a wide range of industry sectors license our suppression files, including retail, financial services (banks, insurance), utilities, travel & leisure, charities and all the major data processing bureaux in the UK.

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