

## TRANSPARENCY NOTICE – LINKED CONSUMER REGISTER

Consumer Data Research Centre (CDRC)  
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UCL Data Protection Officer: [data-protection@ucl.ac.uk](mailto:data-protection@ucl.ac.uk)

As referenced by the CDRC Privacy Notice for CDRC acquired data at  
<https://www.cdrc.ac.uk/privacy-notice-cdrc-acquired-data/>

Data Partners	Value Added Data Resellers
UCL Status	Public Authority
Data	Publically available Electoral Roll and consumer data 1998-present (inclusive).
Description	<p>The data have been compiled from the individual names and addresses of adults (including those likely to attain voting age during the year to the currency of the relevant Electoral Register) in the UK. The source attempts to identify all such individuals for each year by augmenting the public version of the Electoral Register with a number of commercial sources, the names of which are not specified. The data are intended to comprise a near total coverage of the adult population at an individual level.</p> <p>The Linked Consumer Register has been compiled from pseudonymised versions of these files.</p>
Lawful Basis for processing personal data	For UCL research purposes, the lawful basis will be GDPR Article 6(1)(e) processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller ('public task');
Purpose for processing personal data	<p>To create a continuous longitudinal record of electoral roll and consumer register data from 1998. Through linking these datasets on the population at the address level we are able to gain a greater understanding of neighbourhood patterns of residential mobility, population change and predicted ethnic composition on an annual basis.</p> <p>These pseudonymised reports will be made available to approved CDRC Users through the Secure Tier of the CDRC Service. <a href="https://data.cdrc.ac.uk/dataset/linked-consumer-registers-1997-2016">https://data.cdrc.ac.uk/dataset/linked-consumer-registers-1997-2016</a></p>
CDRC Service Tier	Secure Tier
Access to data	CDRC researchers (academics, research staff and postgraduate students) can access the data in CDRC research laboratories, provided always that: (i) such access is for internal research purposes only; (ii) such data is stored securely on CDRC

	<p>servers behind the university's Firewall with restricted and managed access; and (iii) it is ensured that all outputs or disclosures do not identify individuals.</p> <p>CDRC Users may apply to access the pseudonymised reports for the purpose of social science research for the benefit of society. Applicants are required to submit a project proposal that is reviewed by the CDRC and an independent Research Approvals Group to ensure the research is beneficial to society and/or has scientific merit. Following approval users are granted access to the data within one of the CDRC's secure research environments. All Users accessing the data are required to have completed safe researcher training as offered by the UK Data Service or Office for National Statistics. All results from analysis undergo a stringent output checking procedure to ensure there is minimal risk of disclosure before being released from the secure environment to the user.</p>
Data Security	<p>The data are held within the CDRC secure research environment (CDRC Research Lab and Secure Lab facility). Access is restricted to CDRC researchers who have completed a safe researcher training course and CDRC Users who have an approved project proposal, have signed a CDRC User Agreement and completed a safe researcher training course.</p>
Retention period	<p>No deletion date. Data will be held by the CDRC and then archived at the UK Data Archive to allow for longitudinal research studies and to enable research to be recreated.</p>
Transferring data outside the EEA	<p>These data will not be transferred outside of the EEA. Access to these data will be restricted to the CDRC secure environments.</p>
Research Exemptions and Derogations	<p>The CDRC's use and holding of these data are covered by derogations for scientific research and statistical purposes. Article 89 of the GDPR provides that processing for such purposes and in the public interest shall be subject to appropriate safeguards, specifically:</p> <ul style="list-style-type: none"> <li>- the technical and organisational measures required by GDPR Article 5(1)(e) 'storage limitation' and 5(1)(c) data minimisation are in place, including access controls, pseudonymisation and the security provisions above;</li> <li>- Using anonymised data where possible;</li> <li>- Ensuring that the processing is not carried out of the purposes of measures or decisions with respect to a data subject; and</li> <li>- Ensuring that the processing is not likely to cause substantial damage or distress to an individual.</li> </ul> <p>Such appropriate safeguards are in place.</p> <p>Section 19 of the DPA 2018 provides that processing that is necessary for archiving and research purposes 'does not satisfy the requirement in Article 89(1) of the GDPR for the processing to be subject to appropriate safeguards for the rights and freedoms of the data subject if:</p>

- It is likely to cause substantial damage or substantial distress to a data subject; or

It is carried out for the purposes of measures or decisions with respect to a particular data subject Measures to minimise likelihood of substantial damage and distress to individuals in accordance with DPA 2018 Part 2 Chapter 2 (19)(2); and provisions to ensure the processing is not carried out for the purposes of measures or decisions with respect to a particular individual in accordance with DPA 2018 Part 2 Chapter 2 (19)(3)

The CDRC ensure safeguarding requirements are adhered to through the Research Approvals Process whereby CDRC Users are required to provide detail on their planned use of CDRC data, proposed outputs and ethical approval for the work. Access to CDRC personal data is controlled and analysis undertaken within the secure environment with outputs checked to ensure results are non disclosive.