

# General Data Protection Regulation

Identifying its impact on marketers and the consumer's moment of truth





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## Permission to market

#### **Overview**

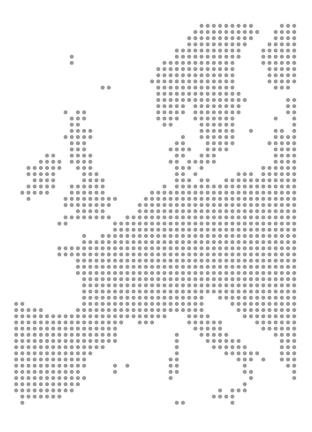


After four years of debate and lobbying, the European Union is about to ratify the General Data Protection Regulation (GDPR), an important update to laws covering the capture, control and consent to use of personal information. While built on the core principles already established by the Data Protection Directive in 1998, GDPR also introduces new rights for consumers and new obligations for businesses.

To understand how these might impact on business critical processes, especially marketing, and on the everyday experience of consumers when asked for their data, DatalQ undertook a twin-track research project among both sides of the data-value exchange. The project had three key objectives:

- To understand the consumer perspective on data collection, consent, context and control.
- To understand the business/marketer's processes, opportunities and challenges in adjusting to the new
- To identify any mis-alignments between the two sides' views of the data exchange and their root causes.

The research was built around four key areas of data protection and privacy management: permission (the consent requested and granted for data use), profiling (the application of data in decision making and the degree to which consumers identify with groups), preparation (the standard to which data needs to be held in order to be effective and how this is recognised by consumers) and protection (the effort made by companies to keep sensitive data secure and the expectation of individuals that this will happen). Results



from the research are presented in a series of four white papers, each of which looks at one of these areas.

This whitepaper specifically focuses on the research segment conducted by DatalQ, in association with Experian. It looks into the issue of how consumers perceive the importance of accuracy in their personal information and where responsibility lies for keeping it up-to-date, as well as what businesses do to ensure



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# Ready for the Regulation - and for what consumers expect



**Janani Dumbleton** Strategy Manager, Data Management **Experian** 



they have data quality at the centre of their data strategies.

People are regularly faced with requests for their data. Whether it's to make a purchase online or to set up a new social media account, they're familiar with this interaction and most have rarely questioned it. They understand that it's a value exchange and that, by trading their personal information, they will receive the goods or services they want quickly and efficiently, with many of those services free in exchange for their data. Increasingly, however, concerns have emerged about what information businesses hold about customers, its accuracy and their ability to access it.

The latest research from Data IQ and Experian has found that consumer attitudes are shifting. Our research highlights three major defining consumer attitudes towards the use of data by businesses: "Trusting", "Rational" and "Cautious", with Cautious being the most significant group and the disposition of half of those surveyed. But even this group, who'd prefer not to share their personal information, still see the value of a data exchange where is it necessary. In order to move consumers along this spectrum, the focus for businesses is on managing data responsibly and in the best interests of their data subjects to build long-term trust and therefore loyalty.

In the 2016 Experian Global Data Management Research, we found that more and more businesses are making the link between data and their ability to put a human face to their customers. They are harnessing their data assets to deliver superior customer engagement and drive growth, which is a move in the right direction. However, the risk with any type of growth strategy is that, without control and structure, it can lead to poor data practices that can undermine the customer's trust.



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The EU's General Data Privacy Regulation (GDPR) was designed around rebuilding this trust for consumers, providing the confidence that customer data is being used in a secure, compliant manner and with a justified purpose. The Regulation sets out clear requirements on how business should manage data with the right level of executive controls and sanctions, distinctly laying out the impact of non-compliance.

This is great news for businesses that have struggled to give data governance and information programmes the focus it has needed, GDPR can play an important role in realising such objectives, but how prepared are businesses for this change?

Our research shows that, despite rapidly-changing consumer expectations, only 7 per cent of businesses feel they are very prepared for GDPR. Two years might sound like a long time to implement a framework to meet these requirements and prepare your data, but there is a lot to consider and it's likely to require a significant amount of internal change to processes, people and technologies.

What's clear here is that businesses still have a long way to go. We hope this paper will help you understand consumer concerns and expectations around the way they believe their data should be handled and also highlight the common challenges businesses are currently facing to help you get ahead of the curve. If you want further advice on how to prepare for GDPR, Experian Data Quality offers a range of services and solutions that can help to support you on this journey.

Janani Dumbleton Strategy Manager, Data Management **Experian** 



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# Key findings



- Awareness of data protection in action is high among consumers, with 84 per cent having seen cookies notices, 76 per cent unsubscribe links in emails and 74 per cent privacy policies. Yet only half say they notice registration forms and requests for their personal information.
- Duplication is the biggest problem consumers notice with the information and marketing they receive - 32 per cent say this happens regularly and 51 per cent sometimes. However, there are fewer problems with email - only 6 per cent regularly spot mistakes and 18 per cent say these never happen.
- The standard set by consumers for data quality is that companies should get their personal details right every time - 70 per cent have this expectation. There is little tolerance of errors with only 9 per cent saying occasional mistakes are acceptable.
- Despite expecting companies to get data right, 57 per cent of consumers accept it is up to them to tell firms when something changes. Strong resistance exists against data sharing of these changes between companies which only 2 per cent of consumers support.

expect their data to be right every time

of consumers regularly get duplicate messages

- Personal information management services could take off if the 61 per cent of consumers who say they are very or quite likely to use one can be believed. There is also a strong interest in having access to preference management centres (59 per cent), but far less in a one-stop data service (40 per cent).
- Given the desire for data to be accurate, consumers are open to being asked sometimes to validate their information (43 per cent), with 29 per cent saying they expect this every time they use a service.
- Eight out of ten marketers are aware to some degree that data protection laws are changing, with nearly half (46.3 per cent) very aware, while one third are somewhat aware. This is important given the potentially long lead times for changes to business processes.
- Nearly half of marketers (46.3 per cent) describe their adoption of data and analytics as developing, while over a quarter (26.8 per cent) are reaching maturity. For 12.2 per cent, that end state is a reality and their marketing is at the advanced stage.

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# Key findings



- A broad range of functions is accountable for data preparation in companies, led by data management (56 per cent), marketing and CRM (53.2 per cent), closely followed by insight and analytics (33.9 per cent), compliance and legal (33 per cent) and board (32.1 per cent). It is somewhat surprising that sales and ecommerce lag behind, at 24.8 per cent and 16.5 per cent respectively.
- The multi-departmental support which data preparation has should form a good basis for strategic measurement of data quality. However, only 17.3 per cent of firms have a company-wide KPI in place - and not only among those with an advanced position on data and analytics.
- Data quality processes appear not to be as developed as might be expected. Only a bare majority of companies (53.2 per cent) are using suppression services - a basic tool for removing goneaways and deceaseds - while just half (49.5 per cent) match their customer data to third party sources for enhancement.

- Most companies are reactive towards giving individuals access to their data, with 38.5 per cent of companies only acting on specific subject access requests. The rate and level of these requests seems likely to accelerate once GDPR is implemented and better understood by consumers.
- There is a very clear recognition that data quality problems either have a very significant impact (34.5 per cent) or at least some impact (43.7 per cent) on organisations.



**78.2**% of companies say data quality impacts their business

# Section 1 -The connected consumer



#### 1.1 - Switched-on consumers

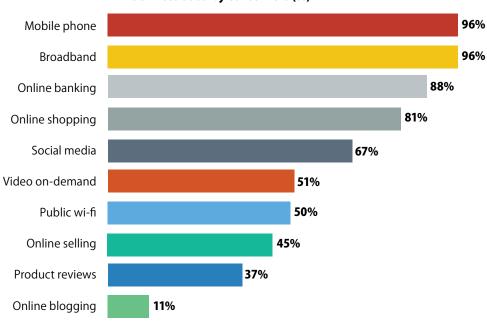
Connection to a mobile phone network and the internet is near universal, giving consumers the ability to operate 24/7 and from any location. This is the environment in which individuals are accustomed to living and which is driving behaviour around transactions and interactions. Public wi-fi is used by half of all consumers - with decreasing costs for mobile data usage, there is perhaps less need for this service.

Online banking has taken hold among nine out of ten consumers, reflecting confidence in the security of this service and the convenience it provides. Online shopping is not far behind, with eight out of ten consumers using e-commerce, although just over half of this number (45 per cent) have reversed the process and sold items online. This level of adoption is a significant aspect of the UK digital economy and an area where it is well ahead of other developed countries.

Two-thirds of consumers are using social media - an important factor in their understanding of the data-value exchange when trading service utility for personal information. It is worth noting that this does not translate into a significant level of electronic word of mouth, in the form of product reviews, which just over one third have written, or online blogging, which is a minority activity for one in nine.

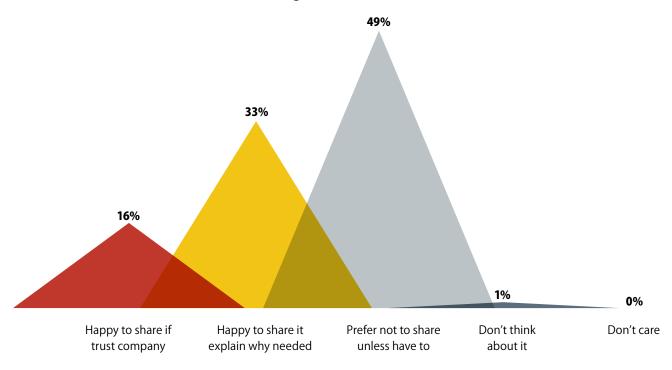


#### Services used by consumers (%)



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#### 1.2 - Consumers and the data-value exchange



#### Attitude to being asked for personal information (%)



With such a high degree of connectivity and internet activity, consumers are regularly faced with requests for their personal information, together with permission to make use of it. This will happen every time they visit a new website, download an app, sign up for a service or make a purchase from an online business for the first time.

As a result, consumers have developed attitudes towards these requests for personal information, although caution is necessary about treating these as drivers of behaviour - other responses show consumers are not consistent in what they do, despite what they say.

#### Three major types of consumer attitude can be identified:

• Trusting - 16 per cent of consumers will share their data if they have trust in the company asking for it.

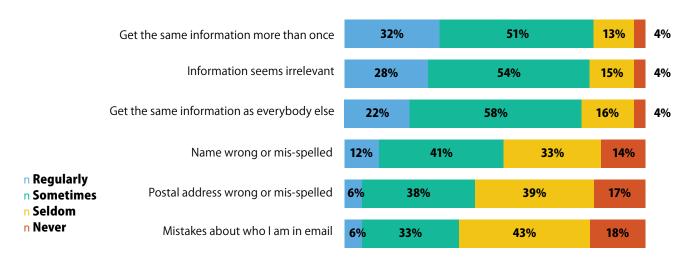
- Rational 33 per cent of consumers will share their data if the company explains to them why it is needed.
- Cautious 49 per cent of consumers say they would prefer not to share their data unless it is really necessary.

Although consumers state clearly what their general attitude is towards being asked for personal information, other questions reveal that specific actions are not always driven by this attitude in the way that might be expected. As a result, marketers need to be cautious about assuming that consumers with an apparently positive (or negative) attitude can be treated differentially - they may in fact respond in an unexpected way.



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# Section 2 - The data quality-conscious consumer



#### Problems with information and marketing received (%)



## 2.1 - Problems noticed in marketing and information received

Every time a consumer is sent a marketing message or information about a brand, it tells that individual something - not just what the company intends, but also how accurate and well-managed is the information it holds on its customers. That creates an awareness of data quality and a sensitivity around data issues which can have an impact on marketing performance. The biggest problem noticed is with duplication - more than eight out of ten consumers say they get the same information more than once either regularly (32 per cent) or sometimes (51 per cent). This is a clear waste of marketing effort which can also undermine attempts at personalisation, since getting the identical message twice (or more) is no longer a personal experience. Consumers are also very social and networked, which is why 80 per cent are able to compare notes and see they are getting the same information as everybody else another negative impact on personalisation.

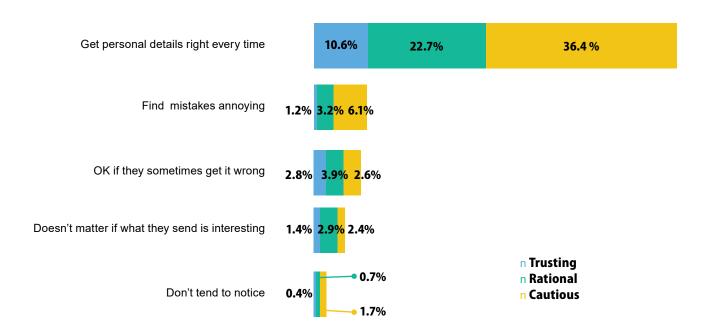
Targeting is the second most noted problem with the majority of consumers saying what they receive is either regularly (28 per cent) or sometimes irrelevant (54 per cent). While consumers are not always as rational as they claim and may still be interested in these items, poor targeting can also give the impression that the company does not know the consumer, despite holding personal information about them.

A majority (53 per cent) regularly or sometimes experience their name wrong or mis-spelled, which can be seen as a reflection of a brand that is not taking enough care with personal information. With 44 per cent also regularly or sometimes seeing errors in their postal address, the ROI on campaigns will not only be harmed - brand reputation can also potentially be damaged.



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#### 2.2 - Getting personal information right



#### Expectations of personal information use (%)



Businesses have internal standards for their data quality against which they benchmark their data management - but do these match the standards which consumers set? This seems unlikely, given that 70 per cent say firms should get personal details right every time. Achieving 100 per cent accuracy may be considered expensive, but if the cumulative costs of marketing wastage, missed sales opportunities - and now potentially eyewatering fines by the regulator - are added together, it is likely to make the investment in data quality seem proportionate.

That is not a reason for dismissing consumer expectations, however, since making mistakes is

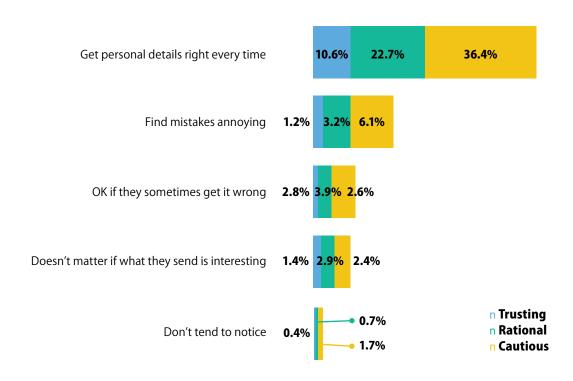
annoying for 11 per cent. Tolerance of occasional errors is only expressed by 9 per cent, while just 7 per cent say mistakes do not mater if the message is interesting. With only 3 per cent saying they do not notice, data quality is clearly a hygiene threshold that companies need to meet.

It is also notable that Cautious consumers, who might be expected to be the most demanding about their personal information being right every time, are no more likely than the Trusting or Rational groups to want total accuracy. Across all three attitudinal types, the view is the same - personal data needs to be accurate.



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#### 2.3 - Keeping personal information accurate



#### Responsibility for keeping personal information up-to-date (%)

The reverse side of consumer expectations about keeping their personal information accurate is that somebody has to be responsible for this.

Despite the strong belief among seven out of ten that data should be correct every time - implying a data quality obligation for companies - the majority of consumers (57 per cent) say it is up to them to communicate any changes to their data. Only 10 per cent think it is for companies to find out when

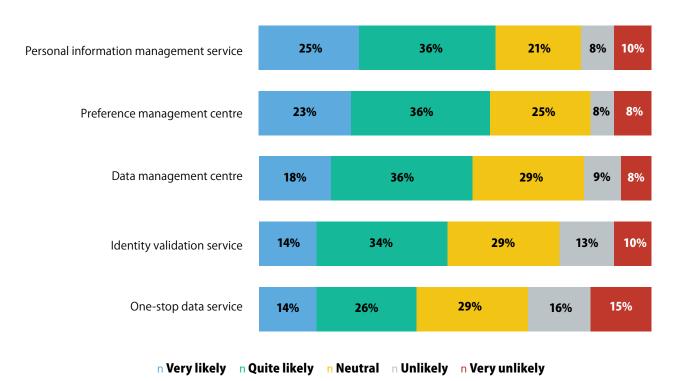
something has changed.

By contrast, 20 per cent say they will inform some companies, but not all, creating a clear gap in the process. There is a limited appetite (11 per cent) for using a one-stop solution to disseminate data changes from a single source, but data sharing by companies themselves has little support (only 2 per cent). As with the expectation that personal information will be accurate, so all three attitudinal groups share the same views that this is their personal responsibility. Firms can not assume that only the Cautious have a strong sense of data ownership - the Trusting and Rational do, too.



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#### 2.4 - Willingness to use data services



#### Personal information services likely to use (%)

With the arrival of GDPR, there is a shift in the balance of power between companies and consumers, with individuals getting more rights, controls and access than before. An eventual outcome from this will be the emergence of new processes and solutions to ensure data quality is maintained by both parties. This will operate both internally and as external, commercial services.

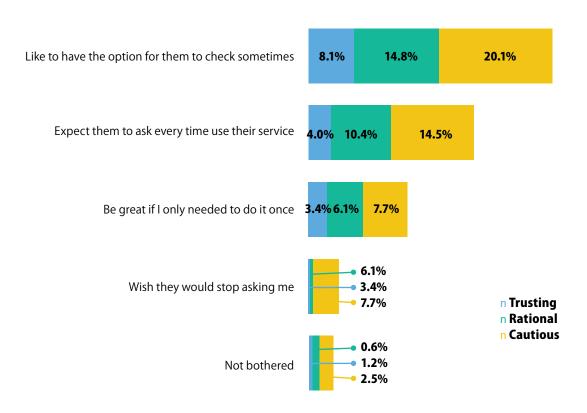
Personal information management services, where individuals store their data and choose who they share it with, are likely to gain the highest level of uptake since 25 per cent of consumers are very likely and 36 per cent guite likely to use one. Hundreds of PIMS have been developed since the concept was first proposed in 2001 - to date, none has gained commercially-viable levels of acceptance, suggesting they still have a long

way to go to translate willingness into action. Preference management centres and data management centres can be read as being mandated by GDPR. They are also very or quite likely to gain usage from 59 per cent and 54 per cent of consumers respectively.

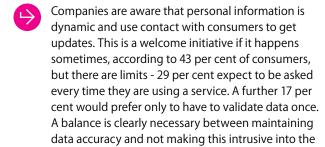
There is also an overall positive disposition towards identity validation services (already being introduced by www.gov.uk) and even to one-stop data services which disseminate information changes. Nearly half of consumers (48 per cent) say they are very or guite likely to use this service, although 23 per cent are negative. Surprisingly, although 40 per cent would adopt a one-stop data service, 31 per cent resist, despite the potential benefits this might deliver in data quality.

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#### 2.5 - Requests to validate personal information



#### Attitude to being asked if personal information is correct (%)



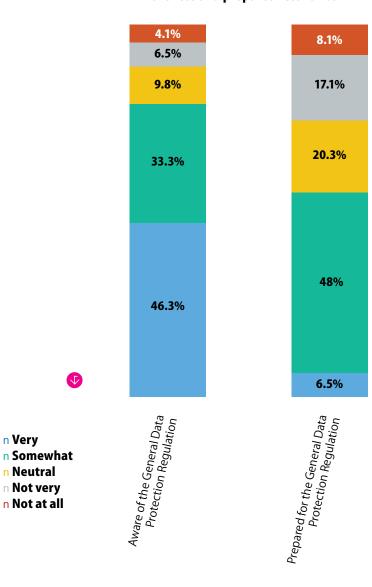
customer experience.

As seen before, Cautious consumers do not simply express the most hesitant view about being asked to update their personal information - twice as many say this should happen every time compared to only doing it once, while three times as many say companies should check with them sometimes. Trusting and Rational consumers are also spread between these preferences, giving companies little reason not to act on data quality because they think consumers do not want them to.



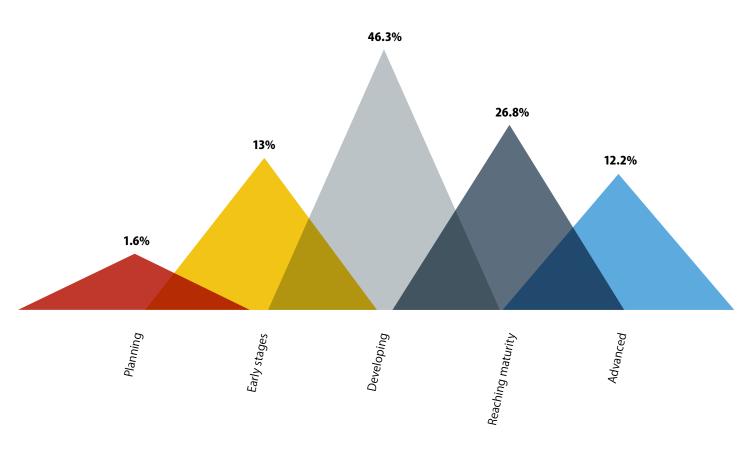
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#### Awareness and preparedness for GDPR



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#### 3.2 - Maturity level of data and analytics



#### Level of adoption of data and analytics (%)



Adopting data and analytics in a business is a complex challenge that requires many changes to people, process and technology. Marketing has been at the forefront of this shift as a result of the data-saturated nature of digital and mobile channels. The marketing function can not ignore the potential benefits of embracing data, but getting to an optimal state takes time.

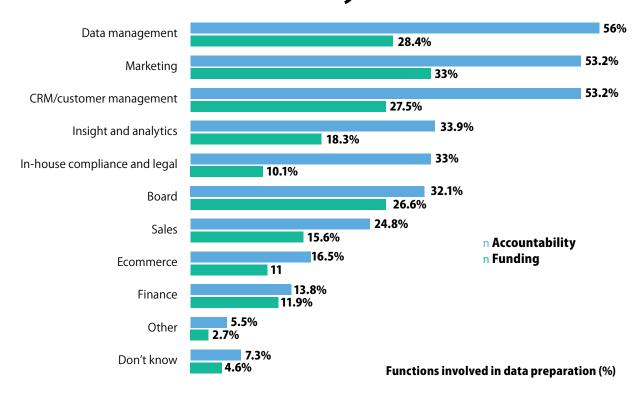
Nearly half of marketers (46.3 per cent) describe their own state as developing - processes are being adapted and data flows harnessed, but the transformation still

has some distance to run. But they have got off to a quicker start than the 13 per cent who are still in the early stages or the 1.6 per cent who are still planning. Over a quarter (26.8 per cent) of marketers are reaching maturity with their strategic objectives nearly achieved. For 12.2 per cent, that end state is a reality and their marketing is at the advanced stage of using data and analytics. It is worth noting, however, that within this group, two-thirds said they were only somewhat aware of GDPR - a surprising gap in their knowledge, given their claimed state of adoption.



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# Section 4 -Business-ready data



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#### 4.1 - Functions involved in data preparation

Customer data is pervasive across organisations, providing the essential fuel for business-critical functions like marketing, sales, ecommerce and CRM, but also supporting strategic functions (board, finance) and requiring its own infrastructure and development (data management, legal, insight). As a consequence, accountability for data being prepared and fit-for-purpose is widely spread - data management (56 per cent), marketing and CRM (53.2 per cent) play the lead roles, closely followed by insight and analytics (33.9 per cent), compliance and legal (33 per cent) and board (32.1 per cent).

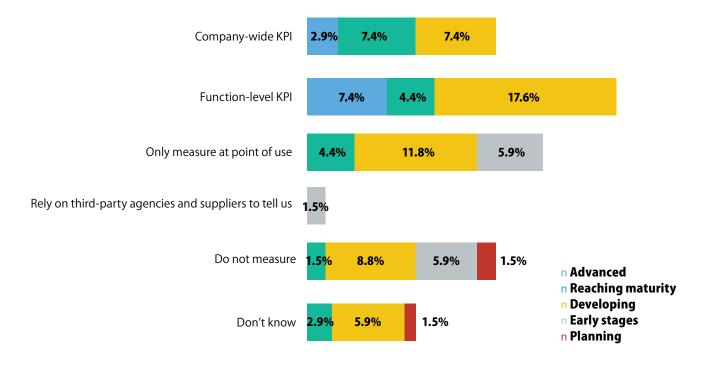
It is somewhat surprising that sales and ecommerce lag behind, at 24.8 per cent and 16.5 per cent respectively, given that they are customer-facing functions. What this finding also reveals is how widely distributed data preparation is across companies, revealing multiple silos which may be working in isolation on their data asset without gaining the benefits of a joined-up approach. Funding the preparation maps slightly differently against these functions, with an encouragingly high-level of top-down backing - 26.6 per cent of companies say the board is a key source of funding, not far behind CRM (27.5 per cent). It is no surprise that marketing (33 per cent) and data management (28.4 per cent) are the lead funders. Again, the multiple sources of funding also gives a picture of potentially inefficient and siloed data preparation.

Currently, in-house compliance and legal are only providing funds in one in ten companies. With GDPR, that seems likely to change as a result of a higher burden in ensuring access and accuracy to be compliant.



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#### 4.2 - Measuring data quality



#### Measuring data quality in the organisation (%)



With access to up-to-date and accurate data so vital, it might be expected that data quality would be a strategic metric, with company-wide key performance indicators. The multi-departmental support which data preparation has should form a good basis for this to happen. However, only 17.3 per cent of firms have a company-wide KPI in place - and this is not only among those with an advanced position on data and analytics, but can also be found in companies reaching maturity or developing.

In fact, the high proportion of Advanced data users who have a function-level KPI for data quality suggests they may not be as well developed as they

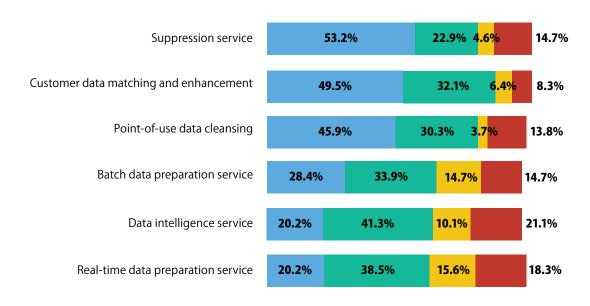
think. By contrast, those whose adoption of data and analytics is Developing but have either a function-level or even company-wide data quality KPI might be doing better than they think.

While it is good to see so few companies relying on external agencies and suppliers providing information on data quality, it is disturbing that 11.9 per cent say they do not measure this at all. Given the impact of data quality on functions across the business (see 4.5 below), this means there will be unseen and unknown problems occurring which they are unable to become aware of.

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#### 4.3 - Use of data quality processes



n Currently use n Would consider using n Would not use n Don't know

#### Data quality processes use or would use (%)



Data quality is a mature practice within data management and has many well-established processes to support it. Even so, only a bare majority of companies (53.2 per cent) are using suppression services - a basic tool for removing goneaways and deceaseds - while just half (49.5 per cent) match their customer data to third party sources for enhancement. Although third party data and profiling will be impacted by the requirements of GDPR - which could be an obstacle to the one-third of businesses who would consider these services - there is no reason why the other half should not have done so up to now.

Similarly, point-of-use data cleansing and batch data preparation have been around for decades, yet 54.1 per cent are not currently using point-of-use data cleansing and 71.6 per cent do not use batch data

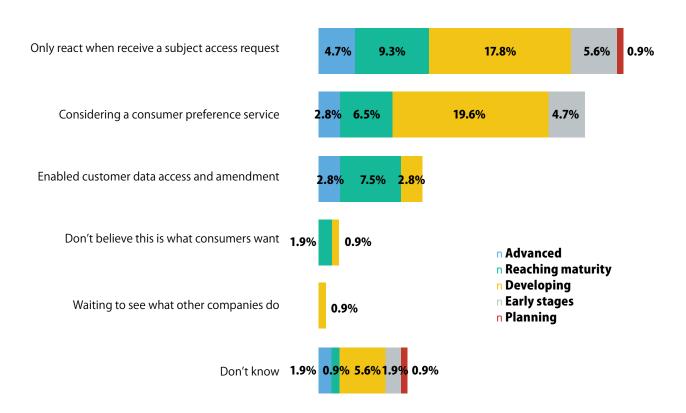
preparation. Existing data protection legislation already requires data to be kept accurate and up-to-date, yet the majority of firms are not doing this. Perhaps it is not surprising only 7 per cent feel prepared for the arrival of GDPR.

Newer services, such as data intelligence (which derives new information about consumers from changes in their data) and real-time data preparation (which streams new information while a business process is running, have only been adopted by one in five companies (20.2 per cent respectively). The picture is of a surprisingly limited spectrum of live data quality initiatives with a significant minority expressing resistance to even the most basic solutions, such as batch data preparation (which 14.7 per cent would not use).



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#### 4.4 - Providing consumers with data access and control



#### Business view of providing individuals with data access (%)



A significant aspect of GDPR is the way it enhances the rights of individuals through providing more choices, more access, the right to data portability and to data deletion. All of which will require re-engineering of the people, processes and technology involved in data management, but especially a transformation of the corporate culture.

At the moment, the most common practice is to be reactive, with 38.5 per cent of companies only acting on specific subject access requests. The rate and level of these requests seems likely to accelerate once

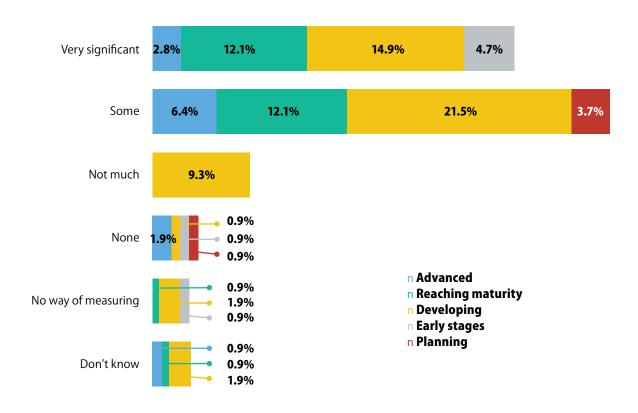
GDPR is implemented and better understood by consumers, which risks leaving companies on the back foot.

More encouragingly, one-third of business are considering the creation of a consumer preference centre, which will not only give individuals more control but also reduce the need to external screening of data. By contrast, only 12.8 per cent have so far enabled customer data access and amendment - there will be a lot of work taking place in a hurry to meet the deadline for GDPR compliance.



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#### 4.5 - Impact of data quality issues on companies



#### Impact of data quality problems (%)



There is a very clear recognition in 79 per cent of companies that data quality problems either have a very significant or at least some impact on their organisation. That is only to be expected when data supports so many business functions which are accountable for it (see 4.1). Just how much impact any problems might have ought to reflect the degree of maturity in data and analytics processes, since the better established these are, the more effectively a company should be able to deal with the issues.

Even so, 2.8 per cent of those experiencing very significant impacts say they are Advanced, while a further 12.1 per cent are Reaching Maturity. That suggests some data problems are very hard to resolve (or that the processes in place at these companies are not as well developed as they believe). One thing in favour of the companies still Developing or in the Early Stages of their data projects is that they are at least aware data quality has an impact - their next steps are to identify how to mitigate these effects.



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## **About Experian**

Experian unlocks the power of data to create opportunities for consumers, businesses and society. At life's big moments – from buying a home or car, to sending a child to college, to growing your business exponentially by connecting it with new customers – we empower consumers and our clients to manage their data with confidence so they can maximize every opportunity. We gather, analyse and process data in ways others can't. We help individuals take financial control and access financial services, businesses make smarter decision and thrive, lenders lend more responsibly, and organisations prevent identity fraud and crime.

For more than 125 years, we've helped consumers and clients prosper, and economies and communities flourish – and we're not done. Our 17,000 people in 37 countries believe the possibilities for you, and our world, are growing. We're investing in new technologies, talented people and innovation so we can help create a better tomorrow.

Learn more at www.experianplc.com

Learn more about data quality from Experian at www.edq.com/uk



## **About DataIQ**

DatalQ aims to inspire and help professionals using data and analytics intelligently to drive business performance across their organisation and in every industry sector.

Specifically, DatalQ helps business professionals to understand the benefits of adopting data-driven strategies, develop compelling business cases, implement best practice, ensure they comply with data regulation, and understand how to use the latest tools and technology to deliver sustained business improvement.

DatalQ achieves this by providing essential insight, help and know-how from proprietary research, analysis, best practice and comment from industry leaders and data experts. All made easily available through high-quality events and digital channels.

Our unique community of business decision-makers and influencers - working across functions in FTSE 100, large and mid market organisations - is growing rapidly as a consequence of this unique focus.

Importantly, DatalQ provides the bridge for ambitious vendors, agencies and service providers to influence this hard-to-reach and unique community.

DatalQ is committed to championing the value of data-driven business and best practice through focusing on the success stories of data-driven professionals with initiatives including the DatalQ Big Data100 and DatalQ Talent Awards, plus many other events and programmes.

We contribute actively to trade and government bodies, including the DMA, IDM, PPA, techUK and UKTI.

For the latest information on how DatalQ can help your organisation go to www.dataiq.co.uk.

For information on how to become a commercial partner to DatalQ, call Adrian Gregory or Adam Candlish on +44 (0)20 3829 1112 or email adrian.gregory@dataiq.co.uk and adam.candlish@dataiq.co.uk



### Methodology

Research for this series of whitepapers was carried out in two parts.

Consumer research was commissioned by DatalQ from Research Now which surveyed an online panel representative of the UK population. All respondents were aged over 18, UK residents and were served a self-completion questionnaire between 14th and 16th March 2016. A total of 1,000 surveys was completed.

Business research was conducted directly by DatalQ among its registered online community. A self-completion questionnaire was served to a total of 187 respondents between 1st and 24th April 2016.

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