

## UNDERTAKING

**Data Controller:** Nationwide Building Society

**Company Reg. No:** N/A

**Head Office:** Nationwide House  
Pipers Way  
Swindon  
SN38 1NW

Nationwide Building Society, Nationwide House, Pipers Way, Swindon SN38 1NW ("Nationwide") acknowledges the details set out below:

1. Nationwide Building Society is the data controller as defined in section 1(1) of the Data Protection Act 1998 ("the Act"), in respect of the processing of personal data carried on by Nationwide. Section 4 (4) of the Act provides that, subject to section 27(1) of the Act, it is the duty of a data controller to comply with the Data Protection Principles in relation to all personal data in respect of which it is a data controller.
2. The Information Commissioner's Office ("ICO") has received a complaint regarding the processing of personal data by Nationwide, and in particular that items of personal information were recovered from refuse bins used by the Oldham branch of Nationwide. This information included a personal financial review in respect of two individuals and a customer information document detailing the customer's names, addresses, dates of birth and telephone numbers.
3. The ICO has considered the data controller's compliance with the provisions of the Act in light of this matter. The relevant provision of the Act is the Seventh Data Protection Principle. This Principle is set out at Part 1 of Schedule 1 of the Act. A copy of the Data Protection Principles is attached.
4. By a letter dated 10<sup>th</sup> January 2007, Nationwide made representations to the ICO.

Following consideration of those representations it has been agreed that, in consideration of the ICO not exercising its power to serve an Enforcement Notice under section 40 of the Act, Nationwide undertakes as follows:-

***Nationwide shall, as from the date of this undertaking and for so long as similar standards are required by the Act or other successor legislation from other data controllers in similar circumstances, ensure that personal data is processed in accordance with the Seventh Data Protection Principle in Schedule 1 of the Act, and in particular that:***

- ***all data protection procedures are reviewed and, if appropriate, updated;***
- ***a review programme to monitor compliance standards relating to the handling and disposal of confidential waste including personal information will be devised and implemented by Nationwide;***

- *appropriate remedial action will be taken by Nationwide if necessary;*
- *adequate and relevant data protection training be given to all employees, including cleaners and sub-contractors who may have responsibility for confidential waste disposal. The effectiveness of the training programme will be assessed in light of the review programme to monitor compliance standards described above. Staff within all branches to be made aware to treat all waste, except domestic waste, as confidential.*
- *a review of all contracts with Nationwide's waste disposal companies will be carried out to ensure they adequately set out the importance of confidential waste disposal*

Dated. [REDACTED]

Signed by Bernard Simpson, Deputy Chief Executive  
and Chief Operating Officer:

.....  
For the Nationwide Building Society

Signed. [REDACTED]  
.....  
For the Information Commissioner

20.02.07.