

DATA PROTECTION ACT 1998

**SUPERVISORY POWERS OF
THE INFORMATION COMMISSIONER**

UNDERTAKING

Data Controller: Post Office Limited

Company Reg. No.: 2154540

Registered Office: 80-86 Old Street
London
EC1V 9NN

We, Post Office Limited, of 80-86 Old Street, London EC1V 9NN hereby acknowledge the details set out below and undertake to comply with the terms of the following undertaking:

1. Post Office Limited is the data controller as defined in section 1(1) of the Data Protection Act 1998 (the "Act"), in respect of the processing of the personal data carried on by Post Office Limited and is referred to in this Undertaking as the "data controller". 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 the data controller.
2. Post Office Ltd has had the following facts drawn to its attention by the Information Commissioner:
 - a. The Information Commissioner (ICO) has received complaints regarding the processing of personal information by the data controller, and in particular that items of personal information were recovered from refuse bins used by the London Road, Southampton, Rymans franchise branch of the data controller.
 - b. This personal information consisted of 65 Form E111 application forms, 158 receipts showing signatures of the payees and also full details of Switch/Maestro cards, 12 travel insurance application forms, 8 daily passport schedules showing names and telephone numbers and a money transfer form showing a name, address and telephone number of 7 customers.
3. The ICO has considered the data controller's compliance with the provisions of the Act in the light of this matter, in particular the Seventh Data Protection Principle, which is set out at Part 1 of Schedule 1 to the Act. A copy of the Data Protection Principles is attached.

4. By a letter dated 28 November 2006, the data controller made representations to the ICO.

Following consideration of those representations it has been agreed that, in consideration of the ICO not exercising his powers to serve an Enforcement Notice under section 40 of the Act, the data controller undertakes as follows:

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

- All data protection procedures are reviewed and, where necessary, updated so as to ensure the correct procedures are in place for the handling and disposal of personal data and action is taken in respect of any failures to comply with procedures that result in a breach of the Seventh Data Protection principle;
- That adequate and relevant data protection training be given to relevant Post Office Limited employees and, in the case of agents, that the Operations Manual is updated to contain clear instructions relating to the secure destruction of personal data;
- All staff are reminded of their obligations in relation to personal data that they process during the course of their work for Post Office Limited, in compliance with the declaration outlined in the Post Office Ltd form "Form P13".

Dated:

26/2/2007

Signed:

**Peter Corbett, Finance Director
For Post Office limited**

Signed:

**Mick Gorrill, Head of Regulatory Action Division
For the Information Commissioner**