



Information Commissioner's Office

**DATA PROTECTION ACT 1998**  
**SUPERVISORY POWERS OF**  
**THE INFORMATION COMMISSIONER**  
**UNDERTAKING**

<b>Data Controller:</b>	<b>Phones 4U Ltd</b>
<b>Company Reg. No:</b>	<b>03154198</b>
<b>Head Office:</b>	Phones 4U House Ore Close Lymedale Business Park Newcastle Under Lyme Staffordshire ST5 9QD

Phones 4U Ltd, of Phones 4U House, Ore Close, Lymedale Business Park, Newcastle Under Lyme, Staffordshire, ST5 9QD hereby acknowledges the details set out as follows:

1. Phones 4U 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 personal data carried on by Phones 4U 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 a data controller.
2. The Information Commissioner (ICO) has received complaints regarding the processing of personal data by the data controller, and in particular that items of personal information were found in rubbish bins outside the Phones 4U premises in Market Way, Coventry and the Phones 4U premises in Regent Street Swindon, both premises of the data controller. This information included documentation showing customer names and addresses, and bank account details.
3. The ICO has considered the data controller's compliance with the provisions of the Act in the 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 to the Act. A copy of the Data Protection Principles is attached.



4. By letters dated 5 March 2007 and 16 April 2007, 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 to comply with the terms of the following undertaking:-

***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 from other data controllers in similar circumstances, 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 paper work containing customer personal data shall be treated as confidential, and shredded before being disposed of.***
- ***Regular adequate and relevant data protection training shall be given to all employees, who may have responsibility for confidential waste disposal, in order to ensure that such personal information is disposed of in a secure manner.***

Dated.....17/5/07.....

Signed. [Redacted]  
For Phones 4U Limited

Signed. [Redacted]  
Mick Gorrill (Head of Regulatory Action Division)  
For the Information Commissioner