

DATA PROTECTION ACT 1998

UNDERTAKING

Data Controller: London Clubs International Limited
10 Brick Street
London
W1J 7HQ

I, Roy RAMM, of London Clubs International Limited (LCI), 10 Brick Street, London, W1J 7HQ, for and on behalf of the LCI hereby acknowledge the details set out below and undertake to comply with the terms of the following undertaking:

1. LCI 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 out by LCI 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 (the "Commissioner") was provided with a report of an incident in which a laptop computer was stolen from the data controller's premises. The laptop computers contained personal data relating to approximately 26,000 individuals. The laptop computer was password protected but was not encrypted.
3. The Commissioner 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 in Schedule 1 Part 1 of the Act.
4. Following consideration of the remedial action that has been taken by the data controller, it is agreed that in consideration of the Commissioner 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 or from other data controllers in similar circumstances, ensure that personal data are processed in accordance with the Seventh Data Protection Principle in Schedule 1 Part 1 of the Act, and in particular that:

- (1) **Portable and mobile devices including laptops and other portable media used to store and transmit personal data, the loss of which could cause damage or distress to individuals, are encrypted using encryption software which meets the current standard or equivalent;**

(2) The data controller shall implement such other security measures it deems appropriate to ensure that personal data is protected against unauthorised and unlawful process, accidental loss, destruction, and/or damage.

Dated. 10/7/2008

Signed

London Clubs International Limited

Signed.....

Mick Gorrill

Assistant Commissioner Regulatory Action Division
For and on behalf of the Information Commissioner