

27 February 2024

Dear 3rd party personal data

Case reference number: IC/0244/2023

Thank you for your response to our enquiries.

Based on the information you have provided; we have decided that regulatory action is not required in this case.

The requirements of the GDPR

We have considered whether your organisation has complied with the requirements of Article 5(f) of the GDPR (the equivalent of the seventh principle of the DPA 1998), which states that:

'Personal data shall be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures ('integrity and confidentiality')

Our consideration of this case and recommendations

After careful consideration based on the information that has been provided, we have decided not to take any formal enforcement action on this occasion. This decision is due to the particular facts of this case and the remedial measures set out in your correspondence which we would expect to be implemented in order to prevent reoccurrence.

If any new information has come to light during your own investigation, or if any detriment has occurred to data subjects during the investigation, you will be required to contact us to provide an update. You can do so by replying to this email, otherwise, we now consider this matter closed.

Further Information

I would recommend reading our GDPR guidance on security, this will support you in protecting your systems and data. You can read this at the following [link](#)

Our practical guide to IT security would also be useful. You can read this at the following [link](#)

The UK's National Cyber Security Centre (NCSC) also provides a useful 10 steps to cyber security plan that I think you may find useful. You can read this at the following [link](#)

Thank you for reporting this incident to the Information Commissioner's Office.

Kindest Regards,



Jonathan Finch

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If you wish to submit an information request or want to exercise any of your data protection rights, please forward your email to the Information Access Team at accessicoinformation@ico.org.uk, or you can call us to make a verbal request relating to your personal data on our Helpline 0303 123 1113.

For information about what we do with personal data see our [privacy notice](#)

Please note that we are often asked for copies of the correspondence we exchange with third parties. We are subject to all of the laws we deal with, including the General Data Protection Regulation, the Data Protection Act 2018 and the Freedom of Information Act 2000. You can read about these on our website (www.ico.org.uk).

We prioritise our investigations according to the likely impact of our actions, including considering the risks, harm and opportunities to improve compliance; alignment with our strategic priorities, including considering whether we are best placed to act or should work in collaboration with others; the likelihood of successful regulatory outcomes consistent with achieving our aims; and the resources we will require to achieve those outcomes.

As such, we aim to complete all our investigations as quickly as possible, and will keep you updated on how we are doing.

Our target is to complete 95% of our investigations within 365 days. We report on our progress on our website at: [Our performance | ICO](#)

The ICO publishes the outcomes of its investigations. Examples of published data sets can be found at this link (<https://ico.org.uk/about-the-ico/our-information/complaints-and-concerns-data-sets/>).

Please say whether you consider any of the information you send us is confidential.

You should also say why so that we can take that into consideration.

However, please note that we will only withhold information where there is good reason to do so.

For information about what we do with personal data see our privacy notice at www.ico.org.uk/privacy-notice