

24 October 2023

Case Reference Number: INV/0283/2023

Dear [REDACTED],

I am a Lead Technical Investigations Officer for the Information Commissioner's Office (ICO) and I have been assigned your breach report for investigation.

This case has been considered under the UK General Data Protection Regulation (UK GDPR) due to the nature of the processing involved.

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

The requirements of the UK GDPR

We have considered whether Zellis UK Limited has complied with the requirements of Article 5.1(f) of the UK GDPR 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 regulatory action on this occasion. It is my conclusion that this case does not reach the requirements for regulatory action based on the information provided.

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

Our own UK GDPR guidance on security provides useful advice to support you in protecting your systems and data. 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.

Yours sincerely

██████████
Lead Technical Investigations Officer
Information Commissioner's Office
██████████

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The ICO publishes basic details about the complaints, investigations and self-reported data breaches it handles. These details include the name of the organisation concerned, the dates that we opened and closed the case, and the outcome. Examples of published data sets can be found at this link: [Complaints and concerns data sets | ICO](#).

We do not include personal data in the published datasets and will anonymise the names of sole traders etc prior to publication. We also do not publish cases concerning domestic CCTV complaints and may not publish certain other cases if we feel it is not appropriate to do so in the circumstances.

If you wish to raise an objection to us publishing a case in the datasets, whether or not we have published it yet, please contact us explaining your reasons for this at accessicoinformation@ico.org.uk. We will only agree to this in limited circumstances where we are satisfied that the interests of the parties involved would override the ICO's obligations to publish this information.

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