

1 May 2025

IC-373998-T5Y8

Request

You asked us:

"Please can you provide a copy of the DPIA completed by the ICO in relation to its use of Upland Adestra. If a DPIA has not been completed, please provide the document or other information that records the reasons not to carry out a DPIA for Upland Adestra.

Please can you also provide any information held by the ICO that reviews the use of encoded URL strings in its public newsletters against the ICO guidance on the use of storage and access technologies (updated 20/12/2024); in particular any information that records whether those encoded URL strings fall under the definition of storage and access technologies."

We have handled your request under the Freedom of Information Act 2000 (the FOIA).

Our response

We have searched our systems based on the information you provided. We have addressed the two parts of your response separately for clarity.

From our understanding, your request refers to the following guidance on the ICO website:

[What are storage and access technologies?](#)

[What are the rules?](#)

This guidance primarily relates to Regulation 6 of the Privacy and Electronic Communications Regulations ("PECR"), which states:

"A person shall not store or gain access to information stored, in the terminal equipment of a subscriber or user unless the requirements of paragraph (2) are met."

Please can you provide a copy of the DPIA completed by the ICO in relation to its use of Upland Adestra.

We confirm that we hold information in scope of your request. Please see attached a Data Protection Impact Assessment ("DPIA") that addresses the ICO's use of Upland Adestra as part of its e-newsletter service.

Please can you also provide any information held by the ICO that reviews the use of encoded URL strings in its public newsletters against the ICO guidance on the use of storage and access technologies (updated 20/12/2024)

We were unable to locate information in scope of your request.

While the attached DPIA does address the use of encoded URL strings using the Adestra server, we note that the DPIA itself was released in 2021, which is prior to the date that you have referred to.

Technically, this means that the DPIA does not fall in scope of your request.

However, you will note that pages 11 and 12 of the DPIA do specifically address the storage and access of data held on the user's device identified in PECR Regulation 6. We provide the relevant excerpt below:

'Adestra have said in respect of their patented link tracking technology:

"The link tracking system does not use any technology (localstorage, cookies, etc) to store or access data on the user's device."

ICO Technology Policy department have advised:

"Adestra does not appear from the information provided to engage Reg.6 of PECR to the extent that it does not access or store information on terminal equipment. [...]"

While this information technically does not fall within scope of this aspect of your request, being released prior to 20 December 2024, I hope that our disclosure the DPIA still broadly addresses the matter.

This concludes our response to your request.

Further advice and assistance

It may also be of interest to you that the ICO privacy policy also specifically addresses the matter of encoded URL strings. You can find more information about this in the ["Subscribing to our e-newsletter"](#) page of the policy.

Next steps

You can ask us to review our response. Please let us know in writing if you want us to carry out a review. Please do so within 40 working days. You can read a copy of our full [review procedure](#) on our website.

If we perform a review but you are still dissatisfied, you can complain to the ICO as regulator of the FOIA. This complaint will be handled just like a complaint made to the ICO about any other public authority. You can [raise a complaint](#) through our website.

Your information

Our [privacy notice](#) explains what we do with the personal data you provide to us, and sets out [your rights](#). Our [Retention and Disposal Policy](#) details how long we keep information.

Yours sincerely



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