

- Information not in scope -

From: Privacy <privacy@centrica.com>
Sent: Thursday, November 2, 2023 3:41 PM
To: Angbean Tariq <Angbean.Tariq@ico.org.uk>
Subject: RE: EXT BG cases

External: This email originated outside the ICO.
Hello Angie

In terms of ID requests, we adopt a risk-aware approach, based on the information we have about the individual from their communication with us, and the request they are making.

Our rules of thumb are:

- We do not seek proof of identity for removal of marketing permissions (i.e. withdrawing consent). This is on the basis that the risk associated with an incorrect / unauthorised cessation of marketing to someone is unlikely to pose any meaningful risk.
- A request for data which we would provide over the phone only the same validation as we would ask someone over the phone.
- Where the request goes beyond what we would do over the phone (e.g. access to more

data than we would provide over the phone), heightened verification is justified, given the heightened risk.

- Where a request asks for data to be sent to an address (email or physical) other than the address we have on file, we will treat that as a high risk request, justifying additional verification.
- We will not treat a request from an email address as being sufficient verification in itself, given the ease of spoofing email addresses.

We distinguish between employee and customer requests. For example, if an employee asks us for a SAR and sends the request from their work account, we treat this as being sufficiently verified. If they sent it from their personal account or via post, we ask them to re-send it from their work account or else to provide ID such as a photograph of their Centrica pass.

We look at the specific risk in the situation too. For example, if a customer asks us for a SAR, and wants us to send it to an address that we hold on file for them, we think that this justifies a lesser degree of verification than if a customer asks us to send personal data to a different address, because of the increased risk of fraud in this latter situation.

In the former situation, our starting point would be for a recent utility bill or council tax bill or the like. In the latter case, we'd also ask for some kind of official or government ID. But we are explicit in our messaging to customers that "If you do not have documents from each column, please contact us (privacy@centrica.com), and we'll do our best to help you."

Similarly, if we have verified a data subject to our satisfaction, and they then ask for further information within 12 months, if the risk profile does not change, we do not ask them to verify themselves again.

Does that help?

Best wishes,

3rdPar

3rdPar

[Redacted signature]

Centrica

From: Angbean Tariq <Angbean.Tariq@ico.org.uk>

Sent: 31 October 2023 08:35

To: Privacy <privacy@centrica.com>

Subject: EXT BG cases

- Information not in scope -

- Information not in scope -

I have a query regarding ID requests. When an individual submits a SAR do you request ID from every individual or specific individuals who you are unsure on their identity? If an individual does not provide ID do you have other processes in place to verify the identity such as contact details, account number DOB? please let me know

- Information not in scope -

Angie

Angie Tariq
Case Officer – Public Advice and Data
Protection Complaints Services – Group 1

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF
T. 0330 414 6789 F. 1625524510
ico.org.uk twitter.com/iconews

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With respect to or otherwise when considering the information contained in, attached to or

From: 3rdPartyDa
To: Daniel Bowling; 3rdParty
Cc: 3rdParty; Ali Hall; John Best
Subject: RE: Centrica
Date: 20 March 2019 15:18:20
Attachments: [image001.jpg](#)
[image002.jpg](#)
[image003.jpg](#)
[image004.jpg](#)
[Item 1.zip](#)
[Item 2.zip](#)
[Item 3.zip](#)

Dear Daniel,

I attach the supporting information to provide further background details in respect of agenda items 1 – 3 below. - Information not in scope -

We look forward to meeting you on 3rd April.

Kind regards,

Yours sincerely,

3rd

From: Daniel Bowling [mailto:Daniel.Bowling@ico.org.uk]

Sent: 18 March 2019 10:50

To: 3rdPartyData

Ali Hall <Alexander.Hall@ico.org.uk>; John Best <John.Best@ico.org.uk>

Subject: EXT RE: Centrica

Thanks 3rdP – I look forward to hearing from you.

Regards,

Daniel

Logo



Daniel Bowling
Senior Policy Officer, Policy & Engagement
(Private and Third Sector)

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

T. 0330 414 6780 F. 01625 524510 ico.org.uk

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From: 3rdPartyData

Sent: 18 March 2019 10:43

To: Daniel Bowling <Daniel.Bowling@ico.org.uk>; 3rdPartyData

Ali Hall <Alexander.Hall@ico.org.uk>; John Best <John.Best@ico.org.uk>

Subject: RE: Centrica

Hi Daniel,

I'm just waiting on a couple more emails. I should have those today and forward everything over later today or tomorrow.

Thanks

3rd



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Visit the [Privacy Portal](#) to find out more

From: Daniel Bowling [<mailto:Daniel.Bowling@ico.org.uk>]

Sent: 18 March 2019 10:40

To: 3rdPartyData

[Redacted] Ali Hall <Alexander.Hall@ico.org.uk>; John Best <John.Best@ico.org.uk>

Subject: EXT RE: Centrica
3rdPartyData

Further to our emails below, I write to enquire regarding the supporting information you have referred to.

3rd party personal data

[Redacted] As such, I would appreciate it if the supporting information could be provided 3rdPartyD [Redacted] at the latest, be available to me 3rdPartyData [Redacted] on 1 April.

This is so I am able to consider the contents and draw on other relevant areas of the ICO (for example, our casework department) ahead of the meeting.

In the meantime, should you require anything further, please do not hesitate to get in touch.

Kind regards,

Daniel

Logo



Daniel Bowling
Senior Policy Officer, Policy & Engagement
(Private and Third Sector)

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

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From: Daniel Bowling

Sent: 27 February 2019 14:51

To: 3rdPartyData

[Redacted] Ali Hall <Alexander.Hall@ico.org.uk>; John Best <John.Best@ico.org.uk>

Subject: RE: Centrica

3rdPa

Thank you for your email and the confirmation of attendance.

- Information not in scope -

We look forward to meeting with you in a few weeks' time. Should you require anything further before 3 April, please feel free to get in touch.

Kind regards,
Daniel



Daniel Bowling
Senior Policy Officer, Policy & Engagement
(Private and Third Sector)

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

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From: 3rdPartyData

Sent: 26 February 2019 16:38

To: Daniel Bowling <Daniel.Bowling@ico.org.uk>; 3rdPartyData

<[REDACTED]> Ali Hall <Alexander.Hall@ico.org.uk>; John Best <John.Best@ico.org.uk>

Subject: RE: Centrica

Hi Daniel,

Thank you for your response.

We can confirm that the proposed meeting time of Wednesday 3rd April at 11am at your offices is agreed, and I shall forward to you the supporting information you have requested in the next few days.

- Information not in scope -

We look forward to meeting you.

Kind regards,

3rd



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From: Daniel Bowling [<mailto:Daniel.Bowling@ico.org.uk>]

Sent: 21 February 2019 11:04

To: 3rdPartyData

[Redacted]

Ali Hall <Alexander.Hall@ico.org.uk>; John Best

<John.Best@ico.org.uk>

Subject: EXT RE: Centrica

3rdParty
Data

Thank you for providing the proposed date and agenda.

- Information not in scope -

With regards to the agenda, we're happy to cover the suggested items.

- Information not in scope -

Kind regards,
Daniel



Daniel Bowling
Senior Policy Officer, Policy & Engagement
(Private and Third Sector)

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

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From: 3rdPartyData

Sent: 19 February 2019 15:14

To: Daniel Bowling <Daniel.Bowling@ico.org.uk>

Cc: Chris Taylor <Chris.Taylor@ico.org.uk>; 3rdPartyData

[Redacted] Ali Hall <Alexander.Hall@ico.org.uk>; John Best

<John.Best@ico.org.uk>

Subject: RE: Centrica

Hi Daniel,

Thanks for this. Very helpful.

- Information not in scope -

2. We have fine-tuned our ID validation process and now we have an even better product, we believe. Due to the fact, that many different ICO case handlers process different Centrica related requests, there seems to be quite a few different views on our approach, which we think is risk based and balanced. On one hand we cannot make the exercise heavy for the customer. On the other hand, we have to make sure, that we don't disclose personal data to unauthorized people.

a. We helped ICO last year with an investigation, where ICO informed us of a UK firm making fake DSARs, impersonating data subjects. Can we talk about how we get consistency in ICO's different views?

- Information not in scope -

How does Wednesday the 3rd of April sound to you?

We are looking forward to seeing you all.

3rdParty

[Redacted]

[Redacted]



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From: Daniel Bowling [<mailto:Daniel.Bowling@ico.org.uk>]

Sent: 15 February 2019 16:25

To: 3rdPartyData [REDACTED]

[REDACTED]

[REDACTED] Ali Hall <Alexander.Hall@ico.org.uk>; John Best

<John.Best@ico.org.uk>

Subject: EXT RE: Centrica

3rdParty

Data

Thank you for your email and apologies for the delay in coming back to you.

With regards to the meeting, firstly, I would ask you to provide a proposed agenda before we establish if this is viable.

- Information not in scope -

Kind regards,

Daniel

|

Logo



Daniel Bowling
Senior Policy Officer, Policy & Engagement
(Private and Third Sector)

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

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From: 3rdPartyData

Sent: 08 February 2019 10:29

To: Daniel Bowling <Daniel.Bowling@ico.org.uk>

Cc: Chris Taylor <Chris.Taylor@ico.org.uk>; 3rdPartyData

Subject: RE: Centrica

Hi Daniel,

I hope all is well.

I was wondering if you would have time for a meet and greet with 3rdPartyData and I anytime, late March?

We would like to share some concerns we see in the market, as well.

We could come visit your office in Manchester?

Have a nice weekend.

3rdP



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Verifying your identity: customers and former customers

We have a responsibility to ensure that we keep your information safe. For that reason, for some requests, we ask you to provide us with proof of identity.

Until we can confirm your identity, we are unable to act on your request.

If you want us to erase some or all of your data

One document from Column A, below.

If you are asking for a copy of some or all of your data

We are required to use all reasonable measures to verify the identity of anyone requesting access to their data. This helps us keep your data safe from unauthorised access.

Where do you want your data sent?	Verification documents needed
To the email address or postal address we have on our account for you	One document from Column A
To an email address or postal address which is not the one we have on our file for you	One document from Column A and one document from Column B showing the address we have on file for you

Document types

Photographs or scans are fine; please do **not** send original documents.

If you do not have documents from each column, please contact us (privacy@centrica.com), and we'll do our best to help you.

Column A

Birth Certificate
Driving Licence
Passport
Photo card ID

Column B

Current utility bill e.g. Gas, Electricity
Council Tax bill
Bank/Store Card Statement
Other formal document providing your name & address

Contacting us

You can contact us writing to The Data Protection Officer, Centrica Plc, Millstream, Maidenhead Road, Windsor, Berkshire, SL4 5GD.

You can also contact us at privacy@centrica.com.

GDPR Data Rights: Making a request to us

You have a number of rights relating to the information we process about you. This document sets out how we approach the handling of your rights, and how you can help us help you.

About Centrica's privacy team

This document was put together by Centrica's privacy team. We handle data rights requests for all the companies in the Centrica group, including British Gas, Dyno, and Hive.

You can contact us by email to privacy@centrica.com or alternatively by post to: Centrica Plc, Privacy Team, Housesteads, Stockport Road, Hattersley, SK14 3QU.

What rights do I have?

If you are an individual, the data protection framework gives you a number of different rights. You can read about them in our privacy notices, which are available on the website of each Centrica company.

For British Gas, you can find our privacy notices here:

<https://www.britishgas.co.uk/privacy-policy.html>

Companies and other legal entities do not have rights under the data protection framework.

Why do you have my data and how do you use it?

We process data for different reasons, depending on the products or services you take, or took, from us.

We set out in our privacy notices what data we process for what purpose, along with information about how we obtain data, and how we share it. We cannot give you more specific information, and turn down requests asking for this.

For British Gas, you can find our privacy notices here:

<https://www.britishgas.co.uk/privacy-policy.html>

For other companies in the Centrica group, please visit that company's website, and look for "privacy notice" or "privacy policy".

How can I exercise my rights?

You can exercise your rights by dropping us a line using the contact details above.

Please tell us:

- what right or rights you want to exercise, so that we know what you want; and
- enough information about you to be able to locate your data (see below).

Please also provide documentation which allows us to verify your identity (see below).

What information should I give you?

Please tell us as much of the information below as you can, so that we can ensure we have done the most thorough search possible for your data:

- Your name (if the account is in joint names then if possible, please provide us with the identity verification documentation of both account holders)
- Your current address
- The address/addresses (if different from your current address) where you had products/services with us
- Your account number/s (if known)
- The telephone number/s that you used to contact us
- If you have had any debt collection activity with us
- Any specific information you are looking for (i.e. copies of bills/calls only)
- How you wish to receive a response – the options are (please choose only one):
 - Secure file transfer (please provide a mobile number for us to send you a password to collect the data) ; encrypted CD-ROM; paper copy
- If you have any special requirements (i.e. large print, Braille) that we should be aware of when handling your request

What identity verification documentation must I provide?

We need to make sure that someone asking to exercise a right is who they say they are. Otherwise, someone could get in touch and get hold of, or ask us to delete, your data.

To protect you from this, we ask for some identity verification documentation from anyone looking to exercise certain rights. Until we can confirm your identity, we are unable to act on your request.

Please see our “identity verification” document for information on what verification we need for different requests.

We will only use the information you provide to us to identify you, to confirm your identity, fulfil your request and meet our obligations under data protection law, and detect and prevent attempts to access personal data unlawfully.

If you do not have identity verification documentation of the types we suggest, please tell us, and we will work with you to verify you in some other way. However, if we cannot verify you, we will not be able to carry out your request.

How quickly will I hear from you?

We work as quickly as possible to assess and support you in the exercise of your data rights.

We aim to acknowledge your request to us within 5 working days, and we have 30 days from the date we have received your valid identification documentation to respond to your request (unless otherwise specified).

If your request is complicated, we may need longer than this, and we will tell you if this is the case as soon as we can.

I want you to delete my data

The right of erasure — to require us to delete your data — only arises in a few situations.

Our policy is that we retain data for the duration of your relationship with us, and then a further eight years. If you are currently our customer, or have been our customer, within the last 8 years, we will not erase all your data. This includes data which we are processing to comply with our legal obligations, such as the maintenance of tax records which we might require to deal with complaints or for the purpose of legal claims.

If you were a customer more than eight years ago, then we are likely to be able to delete your data, if we still have it.

Making a complaint

If you are unhappy with how we have conducted your Data Rights request, we would appreciate an opportunity to address your concerns with you in the first instance. You can contact us by email to privacy@centrica.com or alternatively by post to: Centrica Plc, Privacy Team, Housesteads, Stockport Road, Hattersley, SK14 3QU.

You can also make a complaint to the Information Commissioner's Office at any time if you have a concern about how we are handling, or have handled, your request, but they will normally expect you to have raised your concern with us first. You can view how to do this at <https://ico.org.uk/make-a-complaint/>

If you have a concern about any of the content received as part of a Right of Access Request, our customer relations team will be happy to look into this for you. You can email them at generalenquiry@britishgas.co.uk.

Verifying your identity: customers and former customers

We have a responsibility to ensure that we keep your information safe. For that reason, for some requests, we ask you to provide us with proof of identity.

Until we can confirm your identity, we are unable to act on your request.

If you are asking for a copy of a specific set of non-sensitive data that would be obtainable via our customer service teams (e.g. copies of bills/list of payments made to us)

We are required to use all reasonable measures to verify the identity of anyone requesting access to their data. This helps us keep your data safe from unauthorised access.

Where do you want your data sent?	Verification documents needed
To the email address or postal address we have on our account for you	No documents required – we will confirm Identification with you through a set of questions based on the information we hold on file for you
To an email address or postal address which is not the one we have on our file for you	One document from Column A and one document from Column B showing the address we have on file for you

If you are asking for a copy of all your data

We are required to use all reasonable measures to verify the identity of anyone requesting access to their data. This helps us keep your data safe from unauthorised access.

Where do you want your data sent?	Verification documents needed
To the email address or postal address we have on our account for you	One document from Column A
To an email address or postal address which is not the one we have on our file for you	One document from Column A and one document from Column B showing the address we have on file for you

If you want us to erase some or all of your data

One document from Column A, below.

Document types

Photographs or scans are fine; please do **not** send original documents.

If you do not have documents from each column, please contact us (privacy@centrica.com), and we'll do our best to help you.

Column A

Birth Certificate
Driving Licence
Passport
Photo card ID

Column B

Current utility bill e.g. Gas, Electricity
Council Tax bill
Bank/Store Card Statement
Other formal document providing your name & address

Contacting us

You can contact us at privacy@centrica.com

Alternatively, you can contact us by writing to Centrica Privacy Team, Housesteads, Stockport Road, Hattersley, SK14 3QU.