

28 March 2025

IC-366830-W6V8

Request

You asked us:

"I am submitting a Freedom of Information (FOI) request under the Freedom of Information Act 2000 regarding Shop Direct Finance Company Ltd (trading as Very and Littlewoods) and any regulatory actions taken against them. [...]"

I request disclosure of the following information for the period 2020 to 2025:

1. Any data protection complaints, investigations, or enforcement actions initiated against Shop Direct Finance Company Ltd related to:

Failure to verify customer identity before issuing credit

Failure to provide customers with their credit agreements upon request

Breach of GDPR regulations, specifically regarding the lawful processing of data under Article 6

Unlawful sharing of customer personal data with third-party debt collectors

2. Any decisions, penalties, or fines issued against Shop Direct Finance Company Ltd by the ICO in relation to consumer data breaches.

3. Any internal guidance issued by the ICO to Shop Direct Finance Company Ltd concerning data processing, identity verification, or consumer rights under GDPR.

If parts of this request are exempt from disclosure, I kindly request that you provide any relevant summaries, reports, or statistics available."

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

Our response

For the purpose of clarity, we have addressed the various parts of your request separately below. We have conducted our searches based on the information provided with your request.

In particular, our search focused on the following organisation names as listed in the ICO's case management system:

Littlewoods Limited
Shop Direct Finance Company Limited (Very)
Shop Direct Home Shopping Limited (Very)

1. Any data protection complaints, investigations, or enforcement actions initiated against Shop Direct Finance Company Ltd related to:

Failure to verify customer identity before issuing credit

Failure to provide customers with their credit agreements upon request

Breach of GDPR regulations, specifically regarding the lawful processing of data under Article 6

Unlawful sharing of customer personal data with third-party debt collectors

While we do hold some data protection complaints about the three organisations listed, we do not hold any information about investigations or enforcement actions.

Of these, we do not hold any complaints specifically about failure to verify customer identity before issuing credit. We should note here that matters of fraud lie outside the ICO's remit, and that the ICO is unable make assessments of this type of complaint.

We also do not hold any complaints specifically regarding subject access requests for credit agreements.

Of the remaining categories of complaint that you identified, we do not hold any data protection complaints about Littlewoods Limited or Shop Direct Finance Company Limited in scope of your request.

Regarding Shop Direct Home Shopping Limited, we hold three data protection complaints related to Article 6 of the UK GDPR, as follows:

Case Reference: IC-225234-P8N6
Received on: 31/03/2023
Completed: 09/05/2023
Outcome: Informal action taken
Infringement
DP complaint resolved by org

Case reference: IC-272715-K6C7
Received on: 20/11/2023
Completed: 06/03/2024
Outcome: No further action
No action
Insufficient information to proceed

Case reference: IC-273734-T3K4
Received on: 28/11/2023
Completed: 01/02/2024
Outcome: Informal action taken
Potential infringement
More work for org – contacted to raise awareness of ind complaint

We also hold one case that relates to the sharing of personal data with a third party debt collector. This is case IC-272715-K6C7, listed above.

The ICO publishes some information about the cases and complaints we handle in our [complaints and concerns data sets](#) on the ICO website. This includes information about [data protection complaints](#), which typically include the name of the organisation, the outcome of the complaint, and what part of the legislation the concerns related to.

Where the above information is available to you via the data sets, it is technically withheld under section 21 of the FOIA. Section 21 states that we don't need to provide you with a copy of information when you already have access to it.

Further information about these three cases has been withheld, as it is exempt from disclosure under section 40(2) of the FOIA and section 44 of the FOIA.

Please find an explanation of these exemptions in the relevant sections of our response on the following page.

2. Any decisions, penalties, or fines issued against Shop Direct Finance Company Ltd by the ICO in relation to consumer data breaches.

We do not hold information in scope of this aspect of your request.

It may be of interest to you that the ICO proactively publishes information on this topic on the [Action we've taken](#) section of the ICO website. This includes [enforcement action](#) such as reprimands and monetary penalties.

I should advise that, if held, information on this topic would likely be exempt under section 21 of the FOIA, as it would already be available to you via this route.

We recommend that prospective requesters review the ICO's published information prior to raising requests.

3. Any internal guidance issued by the ICO to Shop Direct Finance Company Ltd concerning data processing, identity verification, or consumer rights under GDPR.

We confirm that we hold information in scope of your request. However, this information is exempt from disclosure under section 40(2) and section 44 FOIA.

This is because disclosure would prejudice the personal data of the relevant complainants, or would prejudice information provided to the ICO by the relevant organisations listed above.

Please find an explanation of these exemptions in the relevant sections of our response on the following page.

Section 40(2)

Where the information held consists of the personal data of the complainants, it has been withheld under section 40(2) of the FOIA. The disclosure of this data would break the first principle of data protection - that personal data is processed lawfully, fairly and in a transparent manner.

There is no strong legitimate interest that would override the prejudice that disclosure would cause to the rights and freedoms of the individuals concerned. So we are withholding this information under section 40(2) of the FOIA.

Section 44

Some information has been withheld under section 44 of the FOIA. Section 44(1)(a) states:

"(1) Information is exempt information if its disclosure (otherwise than under this Act) by the public authority holding it -

(a) is prohibited by or under any enactment"

The enactment in question is the Data Protection Act 2018. Section 132(1) of part 5 of that Act states that:

"A person who is or has been the Commissioner, or a member of the Commissioner's staff or an agent of the Commissioner, must not disclose information which—

(a) has been obtained by, or provided to, the Commissioner in the course of, or for the purposes of, the discharging of the Commissioner's functions,

(b) relates to an identified or identifiable individual or business, and

(c) is not available to the public from other sources at the time of the disclosure and has not previously been available to the public from other sources,

unless the disclosure is made with lawful authority."

Section 132(2) lists circumstances in which a disclosure can be made with lawful authority, however none of them apply here. As a result, the information is exempt from disclosure.

This concludes our response to your request.

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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