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Date: 11 March 2025

IC-365219-T9S8

Request

You asked us:

"I am making this request under the **Freedom of Information Act 2000** for details regarding any civil investigations conducted by the Information Commissioner's Office (ICO) into the following entities:

- 1. NorthEdge Capital LLP
- 2. Synova LLP
- 3. Eversheds Sutherland (International) LLP

I understand that these entities appear in the ICO's published **Civil Investigations datasets** from January 2020 onward. I request access to the following records related to these investigations:

- 1. Case Reference Numbers associated with any investigation of the named entities.
- 2. Copies of all investigation reports, closure letters, decision notices, and related correspondence between the ICO and the named entities.
- 3. **Details of the complaints or concerns raised** that prompted the investigations, including the specific alleged breaches of GDPR, DPA 2018, or PECR (where applicable).
- 4. **ICO's findings, determinations, and any reasoning behind the decision** to close these investigations (particularly where the outcome was "No Further Action" or "Resolved by Advice").
- 5. **Any internal ICO memos, assessments, or meeting notes** discussing the investigations into these entities.
- 6. **Any enforcement action considered or taken**, including informal warnings, recommendations, reprimands, enforcement notices, or monetary penalty notices.
- 7. **Details of any third parties involved** in the investigations (e.g., complainants, data subjects, or other regulatory bodies referenced in ICO's files).

If any part of this request is denied under an FOIA exemption, I request that you provide:



- A justification for withholding the information (including specific exemptions applied).
- Confirmation of whether any redacted or partial information can be provided.

Where possible, I request that the information be provided in electronic format via email. If the information is too extensive for email transmission, please confirm alternative methods for access."

We received your request on 23 February 2025. We have handled your request under the Freedom of Information Act 2000 (the FOIA).

Our response

We use a case management system called Crimson for matters which have progressed to investigation. I searched Crimson for the keywords "NorthEdge", "Synova", and "Eversheds" and there were zero results. I can therefore confirm we do not hold any information in scope of your request.

It is entirely possible that an investigation may appear on our civil investigations dataset but have otherwise been deleted in line with our retention period.

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 <u>review procedure</u> 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 <u>privacy notice</u> explains what we do with the personal data you provide to us, and sets out <u>your rights</u>. Our <u>Retention and Disposal Policy</u> details how long we keep information.

Yours sincerely





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