

DATA PROTECTION ACT 1998

UNDERTAKING

Data Controller: DSG Retail Limited

Maylands Avenue
Hemel Hempstead
Herts
HP2 7TG

I, John Browett, Chief Executive of DSG Retail Limited ("DSG"), for and on behalf of DSG, hereby acknowledge the details set out below and undertake to comply with the terms of the following Undertaking:

1. DSG Retail Limited is the data controller as defined in section 1(1) of the Data Protection Act 1998 (the "Act"), in respect of the processing of personal data carried out by DSG and is referred to in this Undertaking as the "data controller". Section 4(4) of the Act provides that, subject to section 27(1) of the Act, it is the duty of a data controller to comply with the data protection principles in relation to all personal data in respect of which it is a data controller.
2. The Information Commissioner (the "Commissioner") was provided with a report by a local authority's environmental health department, detailing their discovery in January 2010 of eight completed credit agreements, which contained personal data relating to customers of one of the data controller's stores, in or near a skip at the premises.
3. The documents related to transactions two years prior to the date of discovery. They had been retained beyond the period specified in the data controller's procedures, and disposed of in a manner inconsistent with those procedures. The data controller's normal procedure for disposal of such documents is to transport them in sealed containers to a central facility for secure shredding. As a result of this incident, the Commissioner also formed the view that the data protection training given to the data controller's staff was limited.
4. The Commissioner has considered the data controller's compliance with the provisions of the Act in the light of this matter. The relevant provisions of the Act are the Fifth and Seventh Data Protection Principles. These Principles are set out in Schedule 1, Part I to the Act.
5. It is agreed that in consideration of the Commissioner not exercising his powers to serve an Enforcement Notice under section 40 of the Act, the data controller undertakes as follows:

The data controller shall, as from the date of this Undertaking and for so long as similar standards are required by the Act or other successor legislation, ensure that personal data are processed in accordance with the Fifth and Seventh Data Protection Principles in Part I of Schedule 1 to the Act, and in particular that:

The data controller shall:

- (1) review its security measures and implement such other security and monitoring measures as it deems appropriate to ensure that credit agreements and their associated personal data are protected against unauthorised or unlawful processing, accidental loss, destruction or damage;**
- (2) ensure that its staff who have access to such data are made aware of the data controller's policy and measures for the storage, use, retention and disposal of credit agreements and their associated personal data, and are appropriately trained how to follow these.**

Dated

Signed
John Browett
Chief Executive
DSG Retail Limited

Signed
Mick Gorrill
Head of Enforcement
For and on behalf of the Information Commissioner