

## **AUDIT TRAIL GUARANTEE**

### **Overview**

The purpose of the 121prodata service is to provide you with the confidence that you have identified every number in your database that is listed on the TPS or CTPS and therefore should not be called. 121prodata will provide a full audit trail of the numbers that you submit for (C)TPS cleaning and will provide this as evidence in the event that you are ever challenged.

### **How does it work?**

Every working day, (Mon-Fri excl. UK Public holidays) we refresh the 121prodata site with the latest available image of the (C)TPS register. Each time you submit your list of numbers for cleaning a reference is allocated to the file. When the cleansed file is returned to you a copy, identified only by the reference, is added to our daily backup as a cc copy of the results email that you will receive. The daily backup is burned to CD along with a copy of the CTPS and TPS registers for that day. We can categorically prove the exact numbers you submitted, the exact numbers that we reported as listed and the exact image of the register for that day.

### **Why identify by the reference alone?**

121prodata take security very seriously and all data is both physically and electronically protected to the highest available standards. When you submit a file only the numbers are sent so the risk of compromising the integrity of your data is limited. However, in the unlikely event that someone should breach our security they would never be able to link the references to you the client as no cross reference exists. The only person, who knows that a particular reference refers to your company, is you, even we don't know.

### **What is your commitment to this guarantee?**

The numbers you present for cleaning must fully conform to the instructions in the file submission guidelines as reproduced below. Files which do not fully conform to the file submission guidelines are explicitly excluded from any guarantee.

You must make your calls to the "clean" list within 28 days or less of conducting your clean.

You must make no call to a number which is identified with the text expression \*TPSLISTED\*

You must archive your cleaning results such that you can identify the date that you cleaned your list, your personal reference and the 121prodata reference.

### **What is our commitment to this guarantee?**

We will maintain a full audit trail stored first by date of cleanse then by 121prodata reference.

We will extract the specific copy file containing the challenged number from archive on demand when you provide the cleanse date and 121prodata reference number plus a copy of the summons from the Information Commissioners Office (ICO).

We will review your original submitted file, the 121prodata cleaned file and the (C)TPS register from that day and which your file was cleaned against.

If the challenged number is listed on this specific copy of the (C)TPS register and the results file from 121prodata has not identified it with the text expression \*TPSLISTED\* and you have fully met YOUR commitment to this guarantee we will deal with the ICO on your behalf and settle any fine or other punishment without further reference to you.

## What do you do if you are challenged?

A complaint to the TPS requires some very specific details including the date and time that the call was made. Once you have confirmed that you did call the number concerned you need to identify which batch job you cleaned it in. Email enquiries@121prodata.co.uk with the clean date and 121prodata reference and either a scanned or faxed copy of the summons from the ICO. We will provide you with the exact version of the TPS that existed on the day your clean took place along side your original telephone number list before and after cleaning. The backup copies are tamper proof so if our records say it wasn't listed, it wasn't listed.

## What does this guarantee cost?

This service is free provided when responding to a summons from the ICO;

- You forward to us the date of the cleanse
- You forward to us the 121prodata reference number for the cleanse.
- You forward to us a copy of the ICO summons.
- The file submission guidelines have been followed in full.
- You have fully met your commitment to this guarantee.

This service is not free if one or more of the above is not fully met when a file search fee of £250 +VAT will be payable.

## File submission guidelines

If you are uploading a file to compare with our system there are a few guidelines you should follow. The following are important:

- **All files must be in a plain text format**, either .csv or .txt.
- **No files shall include any database control characters.**
- **All telephone numbers must be full UK format, including the leading zero**
- **International dialing format must not be used.**
- **Telephone Extensions must be removed.** If a number is "01234 123456 ext 23" it will be read as "01234 12345623".
- Files must be a **maximum of 2 Megabytes**. If your file is larger than this you might want to try stripping spaces or hyphens.
- **Files must contain one number per line and no other details what so ever.** A sample of a file is shown below. Note that spaces and punctuation marks are ignored during checking and reporting.

### Submitted File

01474-353582  
0207 655 4014  
01293510829  
(01293) 409298  
07873 493520

### Results File

01474353582  
02076554014  
\*TPSLISTED\*01293510829  
01293409298  
07973493520

**I have read, understood and accept the terms of the guarantee.**

Name:

Company:

Position:

Signature:

Date: