

## 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 registers 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 by the Information Commissioner's Office (ICO).

### How does it work?

Every working day at midnight, (Mon-Fri excl. UK Public holidays) we synchronise the 121prodata TPS and CTPS register lists with the official DMA/TPSL server's version. This is the most up to date version of both registers, to the last business day. 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. We can categorically evidence the exact numbers you submitted, at what time/on which date, and the numbers that we reported as C/TPS listed.

### Why identify by the reference alone?

121prodata takes security very seriously and all data is both physically and electronically protected to the highest available standards. The whole 121prodata website is HTTPS/ SSL-encrypted. We ask clients to only submit files containing telephone numbers (no personal data). 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.

### What is your commitment to this guarantee?

The numbers you present for cleaning must fully conform to the instructions in the file submission guidelines at <http://www.121prodata.co.uk/preparing-your-numbers/>. Files which do not fully conform to the file submission guidelines are explicitly excluded from this guarantee.

- You must make your calls to the "cleaned" 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\*, \*CTPSLISTED\*, or 'Yes' (depending on the output format of your check).
- 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 list containing the challenged number(s) from archive on demand when you provide the cleanse date and 121prodata reference number plus a copy of the complaint letter from the Information Commissioner's Office (ICO) if appropriate.

We will review your original submitted file, the 121prodata cleansed file and the record of the match held for that reference number and verify the details of the check and the outcome.

If the challenged number was listed on the specified (C)TPS register(s) and the results file from 121prodata has not flagged it appropriately as having matched and you have met your commitment to this guarantee in full, we will help you deal with your response to the ICO.

### **What do you do if you are challenged?**

A complaint to the TPS by an individual or company, requires some very specific details including the date and time that the call was made. The ICO will, in a letter to you, confirm these details, so that you can check your records. Once you have confirmed that you did call the number concerned you need to identify which batch job you TPS-cleaned it in.

This information can be found in your Account History.

Email [helpme@121prodata.co.uk](mailto:helpme@121prodata.co.uk) with the clean date and 121prodata reference and a scanned copy of the letter from the ICO. We will provide you with confirmation of the date that the screening took place. The backup copies are tamper proof, so if our records say the number wasn't listed, it wasn't listed.

If you cannot locate when the number was screened, please email [helpme@121prodata.co.uk](mailto:helpme@121prodata.co.uk) and we will help.

### **What does this guarantee cost?**

This service is free provided when responding to a letter from the ICO that you have used 121prodata's TPS checking service (online, managed or API) and:

- 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 letter (if appropriate)
- 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. If they are not met, a file search fee of £100+vat will be payable.

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

Name:

Position:

Company:

Signature:

Date: