Audit Trail Guarantee

C/TPS Screening

Version 4 – 10 November 2026

1. 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 if you are ever challenged by the Information Commissioner's Office (ICO).

121prodata is a full TPS and CTPS licensee. We are licensed to screen lists of telephone numbers for other organisations.

No form needs to be completed or signed. This guarantee applies automatically to every client using our TPS and CTPS checking service (online, managed or API), provided the client meets its commitments in section 4.

2. How does it work?

Every working day at midnight, (Mon-Fri excl. UK Public holidays) the official TPS and CTPS registers are updated and made available to licensees. Daily, 121prodata synchronises the files we make available for comparison by clients. This is the most up to date version of both registers, to the last business day. Every number submitted is checked against the CTPS register first; only numbers not found on CTPS are then checked against the TPS register, and a number found on either register is reported as listed. Each time you submit a number or list of numbers for cleaning a unique 121prodata reference is allocated. When the cleansed number/file results are presented to you, a copy identified only by the reference is added to our audit trail archive. Separate backups of our systems are held in the UK for a rolling period of seven days. 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.

3. 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 numbers/files containing only telephone numbers (no personal data).

4. What is your commitment to this guarantee?

The numbers you present for cleaning must fully conform to our submission guidelines. Files and single numbers which do not fully conform to these guidelines are explicitly excluded from this guarantee. API users should follow guidelines set out in our API documentation.

You must make no calls to numbers which are identified:

- Website account single number checks: 'THIS NUMBER IS CTPS LISTED - DO NOT CALL IT!' Or 'THIS NUMBER IS TPS LISTED - DO NOT CALL IT!'
- Website account number list checks: 'Yes' in the field adjacent to the phone number submitted.

- API checks (single number and bulk): the text expression ‘listed’ (‘safe’ means the number was not found on either register at the time of the check).

You must make your calls to the “cleaned” number/list within 28 days of conducting your clean to stay legally compliant.

5. What is our commitment to this guarantee?

We will maintain a full audit trail stored first by date of cleanse and 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. For API calls, we will provide a .csv file for all number comparisons, with check results, between two given dates.

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, for you to submit on request to the ICO.

We keep the audit trail for 10 years from the date of each check and then delete it. If you ask us in writing to delete particular checks, we will do so, including from our backups (which are held for a rolling seven days), and we will confirm when it is done. Checks deleted in this way are no longer covered by this guarantee.

6. What do you do if you are challenged?

A complaint to the Telephone Preference Service 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 will need to share details of the number(s) with us and a scanned copy of the ICO letter to helpme@121prodata.co.uk.

You can also run your own number search in your 121prodata online Account History.

The audit trail copies are tamper-proof, so if our records say the number wasn’t listed, it wasn’t listed. We will provide you with confirmation of the date that the screening took place.

If you cannot locate when the number was screened, please email helpme@121prodata.co.uk and we will help.

7. 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 (if using the online checker)
- 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.