

FOI number: **HBC_FOI_20200419**
 Date FOI Received: **22/07/2020**
 Department: **Legal**
 Title: **Sale of personal data**
 Description: **Sales of personal data Jan 2019 – Aug 2020**

Request: (As Redacted sent by requestor)

- Can I please have your records concerning the sales of personal data from 2019 and 2020, including trading partners and money earned from transactions?
- Please can I have your records concerning the determining the price of personal data, for sales and sharing for the time period January 2019- Present.
- What is your internal procedure for selling personal data? By this, I mean guidance given to internal staff and the buyer in question, for the time period of January 2019- Present.
- What types of personal data do you sell and are there any limits placed on this? For the time period of January 2019- Present.
- How many Subject Access Requests did you receive in the period 2017-2020, broken down by year? What types of personal data did they typically receive? For example email addresses, home addresses and telephone numbers?

Response: (Response as Redacted sent by service)

The only personal data sold by Hertsmere Borough Council is the Electoral Register. The below table shows the sales of the electoral register in all formats from Jan 2019 to Aug 2020:

	Amount	Description
JAN 2019	464.50	EQUINITI HOLDINGS (Credit reference agency Full Annual and Monthly Alteration notices)(CRA F)
JUL 2019	18.40	Electoral Services Payments (Political Party marked register (PP MR))
JUL 2019	51.00	Electoral Services Payments (PP MR)
JUL 2019	97.00	Electoral Services Payments (PP MR)
AUG 2019	87.00	HERTSMERE LIBERA (PP MR)
SEP 2019	22.00	HERTSMERE LIBERAL (PP MR)
JAN 2020	465.50	EQUIFAX LIMITED (CRA F)
JAN 2020	179.00	HERTSMERE LIB DEMS (PP MR)
FEB 2020	137.00	ARISTOTLE INTERNAT (CRA part)
FEB 2020	438.00	LEXISNEXIS RISK SO (CRA Full)
JUN-2020	51.50	Intelligent Tracin (open register Part)

Legislation within The Representation of the People Regulations 2001 Part 5 (as amended 2002) 'Supply of the electoral register' lays out who is entitled to purchase the full electoral register, the open register, list of overseas voters and the marked polling station register. This also specifies the amounts that can be charged.

The legislation can be found at: <https://www.legislation.gov.uk/ukxi/2002/1871/made>

In particular regulations 110, 111, 113, 114 and 120 relate specifically to fees and requirements.

All requests to purchase the register must be in writing to The Electoral Registration Officer/ Returning Officer and in accordance with the legislation.

The number of Subject Access requests are broken down as follows:

2017: 11

2018: 5

2019: 20

2020: 20

Personal data as defined by article 4 GDPR

If you have any queries about the processing of your request then please do not hesitate to contact me. Further information explaining the Council's process for responding to information requests together with a complaints/appeals procedure is available in our reception or via our website at:

<https://www.hertsmere.gov.uk/Your-Council/Official-Publications--Guides--Policies/Access-to-Information.aspx>

The Information Commissioner oversees the application of the Freedom of Information Act. You may contact the Information Commissioner at:

Information Commissioners Office
Wycliffe House, Water Lane
Wilmslow
Cheshire SK9 5AF
Telephone: 01625 545700
Website: www.informationcommissioner.gov.uk

Please include the above reference number on all correspondence related to this request.

Thank you for your request.

Kind regards
Information Services

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