

From: [REDACTED] [gmail.com](mailto:[REDACTED]gmail.com)

Sent: 24 November 2025 06:19

To: DPO RBUB <DPO-RBUB@worldline.com>; [REDACTED] [worldline.com](mailto:[REDACTED]@worldline.com); MCGUIRE, David <[\[REDACTED\]@worldline.com](mailto:[REDACTED]@worldline.com)>

Cc: dpo-worldline-france <dpo-worldline-france@worldline.com>

Subject: ARTICLES 12-15 UNITED KINGDOM GENERAL DATA PROTECTION REGULATION / DATA PROTECTION ACT 2018

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Dear Sir/Madam,

I write under Articles 12–15 UK GDPR in relation to the processing of my personal data arising from, or connected to, Claim [REDACTED] ([REDACTED] v Worldline IT Services UK LTD)..

Please confirm:

1. All third parties (internal or external) to whom my personal data was disclosed in connection with [REDACTED]
2. For each third party, please specify:
 - (a) the categories of personal data shared;
 - (b) the date(s) and method of disclosure;
 - (c) the purpose of the disclosure;
 - (d) the lawful basis under Article 6 UK GDPR;
 - (e) any special category condition under Article 9 UK GDPR relied upon;
 - (f) whether onward disclosure occurred.
3. Please confirm the identity of the data controller(s) responsible for decision-making relating to my personal data during the lifecycle of Claim [REDACTED]
4. Please provide:
 - (a) the relevant parts of your Article 30 ROPA relating to [REDACTED]
 - (b) any inter-entity data sharing arrangements;
 - (c) any Data Processing Agreements governing disclosure of my data to external counsel, external law firms, or to any third party.
5. Please confirm whether any of my personal data was shared with:
 - [REDACTED]
 - [REDACTED]
 - any associated advisors;
 - any entity within the Worldline group other than the direct instructing legal team.

This is a statutory request. A response is required within 30 days of receipt under Article 12 UK GDPR.

Failure to respond will cause significant distress and result in immediate escalation without further notice.

Yours faithfully,

[REDACTED]

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Please consider the environment before printing, sending or forwarding this email.

From: [REDACTED] <[\[REDACTED\]@gmail.com](mailto:[REDACTED]@gmail.com)>
Sent: 25 November 2025 17:00
To: DPO RBUB <DPO-RBUB@worldline.com>
Cc: [REDACTED] [REDACTED] <[\[REDACTED\]@worldline.com](mailto:[REDACTED]@worldline.com)>
Subject: Re: ARTICLES 12-15 UNITED KINGDOM GENERAL DATA PROTECTION REGULATION / DATA PROTECTION ACT 2018

You don't often get email from [REDACTED] [gmail.com](mailto:[REDACTED]@gmail.com). [Learn why this is important](#)

Caution! External email. Do not open attachments or click links, unless this email comes from a known sender and you know the content is safe.

Dear Sir

I copy in the ICO. There is no requirement to file this via your portal. I have emailed the DPO email and you should respond properly. Failing the 30 day period I shall make a formal ICO complaint.

Your response is incoherent and unreasonable as the ICO will see via the attached.

Yours faithfully

[REDACTED]

From: DPO RBUB <DPO-RBUB@worldline.com>
Sent: Tuesday, November 25, 2025 5:20:13 pm
To: [REDACTED] <[\[REDACTED\]@gmail.com](mailto:[REDACTED]@gmail.com)> [REDACTED]
Subject: RE: ARTICLES 12-15 UNITED KINGDOM GENERAL DATA PROTECTION REGULATION / DATA PROTECTION ACT 2018

Hello [REDACTED] and ICO Casework Staff,

Our mail below is our acknowledgement that your SAR has been received.

Indeed, per the ICO guidance below the method of submission of SAR is unrestricted.

But GDPR also requires transparency, good management, and clear traceability of all correspondence between our company and the requester. In this respect – the use of a general email account at our end has significant disadvantages when compared to the usage of purpose made platform that manages SAR in a GDPR compliant manner.

Please proceed with the submittal of the detail of your SAR via our submittal form, if you cannot or do not want to use the submittal form that is ok. We will enter your information into our SAR processing platform and we can progress from there.

"How do we recognise a subject access request (SAR)?

An individual can make a SAR verbally or in writing, including on social media. A request is valid if it is clear that the individual is asking for their own personal data. An individual does not need to use a specific form of words, refer to legislation or direct the request to a specific contact.

Kind regards,

[REDACTED] PC.dp

Data Protection Officer

United Kingdom Region

WORLDLINE 

Mob +44 (0) [REDACTED]
DPO-RBUB@worldline.com

From: DPO RBUB
Sent: 06 December 2025 16:47
To: [REDACTED] <[REDACTED]@gmail.com>
Subject: RE: ARTICLES 12-15 UNITED KINGDOM GENERAL DATA PROTECTION REGULATION / DATA PROTECTION ACT 2018

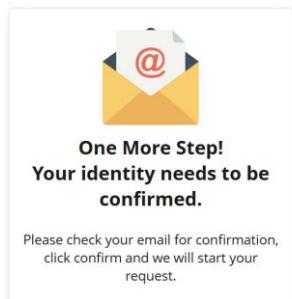
Hello [REDACTED]

To comply with GDPR ID authentication rules -- please send (by return email) valid photo ID that includes your present address – example: Driver's License.

Further to our previous correspondence - I completed Worldline's online OneTrust subject access request form and submitted it for processing.

Please check your mailbox/ SPAM and respond to the mail from the OneTrust system - this step is to confirm your email is valid.

It may contain have a message like this:



Kind regards,

[REDACTED] PC.dp

Data Protection Officer

United Kingdom Region



Mob +44 (0) [REDACTED]
DPO-RBUB@worldline.com

From: DPO RBUB <DPO-RBUB@worldline.com>
Sent: Tuesday, December 23, 2025 20:49
To: [REDACTED] <[REDACTED]@gmail.com>
Cc: DPO RBUB <DPO-RBUB@worldline.com>
Subject: Response - RE: ARTICLES 12-15 UNITED KINGDOM GENERAL DATA PROTECTION REGULATION / DATA PROTECTION ACT 2018

Dear Mr [REDACTED]

The attached includes the following plus an Annex A that includes the additional information you requested.

Response to your data subject access request dated 24 November 2025

This email is further to your data subject access request ("DSAR") to Worldline IT Services UK Limited ("Worldline UK", "we", "our", "us") dated 24 November 2025, which Worldline UK acknowledged on 25 November 2025.

This response is made by Worldline UK as the recipient of your request and is not made by any other Worldline group entity.

Your Request and Worldline UK's Response

We set out in this email information relating to Worldline UK's processing of your personal data relevant to your request, specifically "*all third parties (internal or external) to whom my personal data was disclosed in connection with Claim [REDACTED]* and related confirmations ("Your Request"). As Your Request relates to specific personal data, we have confined our response to that specific personal data in accordance with Article 15(1) UK GDPR.

Please refer to Annex A for a table of information relevant to Your Request and to which you are entitled under Article 15 UK GDPR. Other than as set out at Annex A, Worldline UK does not intend to provide you with information to which you are not entitled under Article 15 UK GDPR, including:

- Dates and methods of disclosure.
- Extracts of Worldline UK's record of processing activity.
- Copies of intra-group agreements or data processing agreements where no transfer safeguards under Article 46 UK GDPR are relied on.

Your Rights

You can request from us the rectification or erasure of your personal data or restriction of processing of your personal data.

You may also have grounds to object to our processing of your personal data.

You also have the right to lodge a complaint to the relevant supervisory authority if you feel we have not complied with applicable law.

Please note that the contact details of the supervisory authority responsible for Worldline UK are as follows:

Information Commissioner's Office

Postal address: Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF

Contact page: <https://ico.org.uk/global/contact-us/>

Kind regards,

[REDACTED] PC.dp

Data Protection Officer

United Kingdom Region

WORLDLINE 

Mob +44 (0) [REDACTED]
DPO-RBUB@worldline.com

ANNEX A – TABLE RELEVANT TO YOUR REQUEST

Name of Recipient	Recipient Address incl. Country	Purpose	Categories of Data	Role	Legal Basis of Processing	International Transfer Safeguard
Orrick, Herrington & Sutcliffe (UK) LLP	107 Cheapside, London EC2V 6DN, United Kingdom	Receipt of legal services in connection with proceedings with [REDACTED] from 2021 in connection to claim [REDACTED]	Personal data required to obtain legal services and to make representations before legal or other competent authorities (name, details of legal matters and any other relevant personal data). The precise personal data Worldline UK disclosed are privileged and confidential	Controller	Art. 6 (1) (f) (legitimate interest) UK GDPR. The interest pursued is the establishment, exercise and defence of legal claims.	N/A
Worldline SA	80 Quai Voltaire	To report to personnel responsible for monitoring data	Personal data relevant to communications	Controller	Art. 6 (1) (f) UK GDPR (legitimate interest). The	N/A

	Immeuble River Ouest, 95870 Bezon France	protection issues and litigations within the group from 2021 in connection to claim [REDACTED]	(name, email address, matters relevant to [REDACTED] dispute with Worldline UK).		interest pursued is managing and reporting legal claims and data protection issues at a group level.	
Worldline Retail Enterprise UK Limited	1 Technology Drive, Beeston, Nottingham, England, NG9 1LA	Litigation reporting from 2021 in connection to claim [REDACTED]	Personal data relevant to communications (name, email address, matters relevant to [REDACTED] dispute with Worldline UK).	Controller	Art. 6 (1) (f) UK GDPR (legitimate interest). The interest pursued is managing and reporting legal claims at a group level.	N/A
Payone GmbH	Lyoner Straße 9 (or 15), 60528 Frankfurt am Main	Coordination of litigation response in respect of claim [REDACTED] from 2021.	Personal data relevant to communications (name, email address, matters relevant to [REDACTED] dispute	Controller	Art. 6 (1) (f) UK GDPR (legitimate interest). The interest pursued is managing and coordinating response to legal	N/A

			with Worldline UK).		claims with a co-defendant.	
Worldline UK Service providers e.g. email	Various	Receipt of IT services including email and other relevant services.	Personal data relevant to communications (name, email address, matters relevant to [REDACTED] dispute with Worldline UK).	Processor	Art. 6 (1) (f) UK GDPR (legitimate interest). The interest pursued is providing Worldline UK's employees with all the relevant tools for their daily work and to support Worldline UK's business functions.	Various, depending on service provider.

From: [REDACTED] <[REDACTED]gmail.com>
Sent: Wednesday, January 21, 2026 16:48
To: DPO RBUB <DPO-RBUB@worldline.com>
Subject: Re: Response - RE: ARTICLES 12-15 UNITED KINGDOM GENERAL DATA PROTECTION REGULATION / DATA PROTECTION ACT 2018

Dear Mr [REDACTED]

I write further to your response on behalf of Worldline IT Services UK Limited ("Worldline UK") to my data subject access request dated 24 November 2025 ("DSAR 1").

Status of DSAR 1 and statutory deadline

My data subject access request of 24 November 2025 ("DSAR 1") was acknowledged by Worldline UK on 25 November 2025. In the absence of any lawful extension notified in accordance with Article 12(3) UK GDPR, the statutory one-month period for compliance expired on 24 December 2025.

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

2. Failure to provide copies where no exemption is claimed

Your response provides only a schedule describing categories of processing and recipients. It does not provide copies of the personal data undergoing processing, notwithstanding that:

- legal professional privilege has been asserted only in relation to external legal advisers, namely Orrick, Herrington & Sutcliffe (UK) LLP;
- no confidentiality or Article 15(4) UK GDPR exemption has been asserted in respect of the remaining categories of data; and
- no deletion pursuant to any retention policy has been stated.

In those circumstances, the refusal to provide copies of the data is unexplained and unlawful. The provision of a narrative description or table does not discharge the obligation for copies without explanation under Article 15(3) UK GDPR.

3. Clarification required and deadline

Please therefore confirm expressly:

- why Worldline UK considers it is entitled to withhold copies of my personal data where neither legal privilege nor confidentiality is claimed; and
- the specific legal basis relied upon for withholding copies of each category of data identified.

Alternatively, please provide copies of the personal data to which no exemption applies.

Given that the statutory deadline has already expired, I require your response to DSAR 1 within 7 days of the date of this letter.

4. Reservation of rights

Nothing in this correspondence resets or extends the statutory deadline. If Worldline UK does not remedy the above deficiencies within the period stated, I will invite the ICO to proceed on the basis of the existing complaint and this further evidence of continuing non-compliance.

5. Processing beyond the scope of [REDACTED] / DSAR 2

Separately, your Annex A indicates that Worldline UK holds and processes personal data about me beyond the narrow scope of Claim [REDACTED] including intra-group reporting and IT processing.

To the extent that Worldline UK processes my personal data outside that claim, please now also provide copies of all personal data held about me by Worldline UK, subject only to lawful and specifically identified exemptions. This will comprise of **DSAR 2**.

6. Statutory time limit

The continued failure in DSAR 1 to provide copies of my personal data therefore constitutes a continuing breach of the UK GDPR. This correspondence does not reset or extend the statutory deadline.

4. Response required

Please provide, within 30 days (**DSAR 2**), either:

1. copies of all personal data held about me by Worldline UK to which no privilege or confidentiality exemption applies; or
2. a clear, itemised explanation identifying:
 - o what data are withheld,
 - o the specific exemption relied upon, and
 - o why partial disclosure by redaction is said not to be possible.

I look forward to your response to the contents of this correspondence and expect all correspondence to be sent via email.

Yours faithfully,

[REDACTED]

From: [REDACTED] <[REDACTED]gmail.com>
Sent: Wednesday, January 21, 2026 16:54
To: DPO RBUB <DPO-RBUB@worldline.com>
Cc: [REDACTED]@worldline.com [REDACTED]@worldline.com>; [REDACTED]
[REDACTED]@worldline.com>
Subject: Re: Response - RE: ARTICLES 12-15 UNITED KINGDOM GENERAL DATA PROTECTION
REGULATION / DATA PROTECTION ACT 2018

Dear Mr [REDACTED]

Further to the below, Worldline UK should set out in response to both DSAR 1 and DSAR 2 the dates when all identified data started being retained and processed, thank you.

Yours faithfully

[REDACTED]

From: [REDACTED]@gmail.com>
Sent: Thursday, January 22, 2026 11:32
To: DPO RBUB <DPO-RBUB@worldline.com>
Cc: [REDACTED]@worldline.com [REDACTED]@worldline.com>; [REDACTED]
[REDACTED]@worldline.com>
Subject: Re: Response - RE: ARTICLES 12-15 UNITED KINGDOM GENERAL DATA PROTECTION
REGULATION / DATA PROTECTION ACT 2018

Dear Mr [REDACTED],

I write further to my email of 21 January 2026 and to Annex A provided with your response of 23 December 2025.

Having reviewed Annex A carefully, the below has been brought to my attention, in particular the final row described as "**Worldline UK Service providers e.g. email**", with recipients listed as "Various" and international transfer safeguards stated as "Various, depending on service provider".

That entry confirms that my personal data is processed through email and other IT service providers. However, it does so only at a generic, system-level description and does not identify the actual recipients, jurisdictions, or the underlying personal data undergoing processing.

For clarity, I remind Worldline UK that:

- **Article 12(1) UK GDPR** requires that information provided to a data subject be supplied in a concise, transparent, intelligible and easily accessible form, using clear and plain language.
- **Article 15(1) UK GDPR** confers a right of access to personal data undergoing processing;
- **Article 15(3) UK GDPR** requires the controller to provide **a copy of the personal data undergoing processing**; and
- Where an exemption is relied upon, this must be **specific and explained**, rather than assumed or applied at a category level.

These provisions are reinforced by **Recital 58 UK GDPR**, which makes clear that transparency requires information to be **concrete, comprehensible, and meaningful to the data subject**, rather than abstract or purely categorical.

A high-level or generic description of processing (such as "service providers e.g. email") does not, of itself, satisfy the obligation to provide a copy of the personal data where no legal professional privilege, confidentiality, or Article 15(4) exemption is asserted.

In light of the above, please now confirm, in respect of the processing described in the final row of Annex A:

1. whether copies of the personal data processed via those service providers will be provided; or

2. if not, the **specific exemption under the UK GDPR** relied upon for withholding those copies, and why partial disclosure by redaction is said not to be possible.

For the avoidance of doubt, I am not asking for system descriptions or policy statements. I am asking for compliance with the statutory right of access as framed by Articles 12 and 15 UK GDPR.

I look forward to your response.

Yours faithfully,

A solid black rectangular box used to redact a signature.