

**From:** DPO RBUB <[DPO-RBUB@worldline.com](mailto:DPO-RBUB@worldline.com)>

**Sent:** Tuesday, December 23, 2025 20:49

**To:** [REDACTED] <[REDACTED]@gmail.com>

**Cc:** DPO RBUB <[DPO-RBUB@worldline.com](mailto:DPO-RBUB@worldline.com)>

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

Dear [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

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**From:** [REDACTED] <[REDACTED]@gmail.com>

**Sent:** 21 January 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

**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 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.

I have since raised a complaint with the Information Commissioner's Office concerning Worldline UK's failure to provide copies of my personal data. For the avoidance of doubt, the existence of that complaint does not suspend or qualify Worldline UK's ongoing statutory obligations under the UK GDPR.

### **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:
  - what data are withheld,
  - the specific exemption relied upon, and
  - 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:** DPO RBUB <DPO-RBUB@worldline.com>

**Sent:** 29 January 2026 18:45

**To:** [REDACTED] <[REDACTED]@gmail.com>

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

Dear [REDACTED]

**Re: Response to your email and further DSAR dated 21 January 2026**

We refer to your email dated 21 January 2026.

Your email contains several allegations and requests relating to a data subject access request (“**DSAR**”) dated 24 November 2025, to which Worldline UK provided responses on 23 December 2025 within the statutory deadline. This letter responds to those allegations and requests.

**1. Alleged failure to provide a copy of personal data**

In your 24 November 2025 DSAR you explicitly narrowed the scope of your request by requesting that Worldline UK “confirm” specific information in relation to claim [REDACTED]. The scope of your 24 November 2025 DSAR did not include a request for copies.

Worldline UK has complied with your 24 November 2025 DSAR within the statutory deadline and provided the information requested.

Your request for copies of the personal data referred to in Worldline UK’s response will be dealt with as a separate DSAR made on 21 January 2026.

**2. Alleged failure to provide copies where no exemption is claimed**

As referred to above, your request for copies of the personal data referred to in Worldline UK’s response will be dealt with as a separate DSAR made on 21 January 2026.

**3. Alleged processing beyond the scope of [REDACTED]**

Like all organisations, Worldline UK uses IT services (e.g. email, document processing) to conduct its activities, including activities performed in respect of your claim [REDACTED].

Likewise, like most (if not all) company groups, risk management activities, such as ongoing litigation and data subject requests, are reported at the Worldline group level. As identified in our response to your 24 November 2025 DSAR, data was shared between members of the Worldline group for the purpose of such intragroup litigation and data protection reporting.

Neither of the above constitute processing outside the ordinary course of responding to and managing litigation. Nothing in our response to your 24 November 2025 DSAR indicates processing beyond the scope of claim [REDACTED] and connected data protection issues.

**4. DSAR 2**

Worldline UK acknowledges receipt of your separate “DSAR 2” made on 21 January 2026 and will respond accordingly.

Yours faithfully,

**Worldline IT Services UK Limited**

Kind regards,

PC.dp

Data Protection Officer

United Kingdom Region

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

**From:** [REDACTED] <[REDACTED]@gmail.com>

**Sent:** Monday, February 02, 2026 09:22

**To:** DPO RBUB <DPO-RBUB@worldline.com>

**Cc:** [REDACTED]@worldline.com>

**Subject:** Re: Response - RE: ARTICLES 12-15 UNITED KINGDOM GENERAL DATA PROTECTION REGULATION / DATA PROTECTION ACT 2018

Dear Sir,

I reject your attempt to recharacterise my request dated 24 November 2025.

A request made under Article 15 UK GDPR creates an immediate statutory obligation to provide copies of personal data. Your decision to provide only a summary table, and to treat the request for actual data as a "new" DSAR is a transparent delay tactic and a breach of your duty to facilitate my rights under Article 12(2) and 15(3).

Specifically, your response remains unlawful for the following reasons:

- **Withholding Copies:** You have no legal basis to "confirm" data exists while refusing to provide the copies by the original statutory deadline.
- **OneTrust & IT Logs:** You have failed to provide the audit trails, system notes, and processing logs within OneTrust and your wider IT infrastructure that contain my personal data.
- **Administrative Records:** You have failed to produce the relevant extracts of your Article 30 ROPA and Data Processing Agreements governing disclosures to Orrick and other third parties.

I have updated my ongoing complaint with the Information Commissioner's Office (ICO) to include this correspondence as evidence of Worldline's bad-faith interpretation of the law.

I do not accept your "DSAR 2" timeline. Worldline has been in a state of continuing non-compliance since 24 December 2025. I expect all outstanding data and the specific legal justifications for any redactions immediately and remind you of the anxiety and distress being caused as you your self have recognised.

Yours faithfully,

[REDACTED]

