CONFIDENTIAL AND LEGALLY PRIVILEGED
POST OFFICE GROUP LITIGATION
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## Decision paper: Deletion of data held on Brands Database

### 1. SUMMARY

1.1 A decision is sought as to whether data held on Post Office's Brands database can be deleted in light of the ongoing duty to preserve documents which may be relevant to the Group Action. The reason for seeking to delete this data is to ensure Post Office's GDPR compliance.

### 2. BRANDS DATABASE

2.1 We have been informed by Andy Knowles of Code (who administer the Brands website on POL's behalf) that Brands is a customer database which contains:

2.1.1 ex-customer records showing personal data and their product holdings older than 7 years; and

2.1.2 lead records for ex-customers and non-customers showing personal data and the products for which they expressed and interest older than 2 years.

2.2 Andy Knowles has also confirmed that the Brands database does not contain any data, documents or record which concern the operation of SPM branches or used for reconciliation purposes.

2.3 A breakdown of the data contained within the Brands database is set out below.

| Total Records | | | | |
|---|---|---|---|---|
| Total Records (nameIDs) on the name table : | 42,890,770 | | | |
| Total for deletion: | 21,550,521 | | | |
| Total retained: | 21,340,249 | | | |
| | | | | |
| Contactable Base | OLD | NEW | Ex customer records contains personal data and products older than 7 yrs | Leads from ex-customers/non customers with personal data and products older than 2 yrs |
| Ok to Mail | 1,975,494 | 1,974,875 | 274 | 345 |
| Ok to Email | 1,659,927 | 1,659,476 | 373 | 78 |
| Ok to phone | 1,764,067 | 1,764,061 | 6 | 0 |
| Ok to SMS | 761,254 | 761,249 | 5 | 0 |
| Car | OLD | NEW | Ex Customers Records | Leads (Ex & Non Customers) |
| Ok to DM | 3,050,591 | 2,173,325 | 157,343 | 719,923 |
| OK to EM | 2,073,564 | 1,787,348 | 148,626 | 137,590 |
| Ok to Phone | 3,504,382 | 2,155,903 | 347,147 | 1,001,332 |
| Ok to SMS | 964,545 | 761,249 | 73,346 | 129,950 |
| Home | OLD | NEW | Ex Customers Records | Leads (Ex & Non Customers) |
| Ok to DM | 2,455,895 | 2,089,310 | 56,594 | 309,991 |
| OK to EM | 1,856,578 | 1,725,600 | 36,216 | 94,762 |
| Ok to Phone | 2,458,585 | 1,976,988 | 67,932 | 413,665 |
| Ok to SMS | 834,944 | 798,221 | 3,842 | 32,881 |
| O50 life | OLD | NEW | Ex Customers Records | Leads (Ex & Non Customers) |
| Ok to DM | 2,260,150 | 1,422,840 | 390,790 | 446,520 |
| OK to EM | 1,052,419 | 827,307 | 156,881 | 68,231 |
| Ok to Phone | 2,851,088 | 1,689,206 | 485,608 | 676,274 |
| Oks to SMS | 428,333 | 343,162 | 19,044 | 66,127 |

3. **RECOMMENDATION**

3.1    Assuming the above assurances about the nature of the data being customer related, rather than branch, this data does not need to be preserved for the purposes of the Group Litigation.