

DATA PROTECTION ACT 1998

UNDERTAKING

Data Controller: Manpower UK Ltd

 Capital Court
 Windsor Street
 Uxbridge
 Middlesex UB8 1AB

I, Mark Cahill, Managing Director of Manpower UK Ltd (the 'Company'), for and on behalf of the Company, hereby acknowledge the details set out below and undertake to comply with the terms of the following Undertaking:

1. Manpower UK Ltd is the data controller as defined in section 1(1) of the Data Protection Act 1998 (the 'Act'), in respect of the processing of personal data carried out by the Company and is referred to in this Undertaking as the 'data controller'. Section 4(4) of the Act provides that, subject to section 27(1) of the Act, it is the duty of a data controller to comply with the data protection principles in relation to all personal data in respect of which it is a data controller.
2. The Information Commissioner (the 'Commissioner') was provided with a report indicating that one of the data controller's employees had emailed a spreadsheet containing the personal data of over 400 individuals to 60 employees in error, none of which consisted of sensitive personal data as defined by the Act. The employee had initially believed that the spreadsheet contained only the employee numbers of those 60 staff.
3. Enquiries revealed that the data controller had not given sufficient consideration to the security of the personal data compromised and had sent all data to the employee involved rather than only that which was required. It was also discovered that the data had been transmitted over the internet without protection. Although the data controller attempted to contact recipients to request deletion of the email, it has not been possible to confirm this in all cases. However, the data controller has confirmed that it has no evidence that the data disclosed has been further inappropriately processed.
4. The Commissioner has considered the data controller's compliance with the provisions of the Act in the light of this matter. The relevant provision of the Act is the Seventh Data Protection Principle. This Principle is set out in Schedule 1, Part I to the Act.

5. Following consideration of the remedial action that has been taken by the data controller, it is agreed that in consideration of the Commissioner not exercising his powers to serve an Enforcement Notice under section 40 of the Act, the data controller undertakes as follows:

The data controller shall, as from the date of this Undertaking and for so long as similar standards are required by the Act or other successor legislation, ensure that personal data are processed in accordance with the Seventh Data Protection Principle in Part I of Schedule 1 to the Act, and in particular that:

- (1) All staff are made aware of the data controller's policy for the storage, transmission and use of personal data and are appropriately trained how to follow that policy;**
- (2) Any personal data transmitted by email over the public internet shall be protected by password or encryption – according to the sensitivity of the data and the risk to the data subjects;**
- (3) Compliance with the data controller's policies on data protection and IT security issues is appropriately and regularly monitored;**
- (4) The data controller shall implement such other security measures as it deems appropriate to ensure that personal data is protected against unauthorised and unlawful processing, accidental loss, destruction, and/or damage.**

Dated

Signed
Mark Cahill
Managing Director
Manpower UK Ltd

Signed
Sally-Anne Poole
Acting Head of Enforcement
For and on behalf of the Information Commissioner