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Friday, 13 February 2026

Data Protection Officer
EE Limited
1 Braham Street
London
E1 8EE

Delivered by email: cpo@bt.com

Dear Data Protection Officer,

Re: Incomplete DSAR response - BAN 225386871/Order xko299591893 (SAR dated 26/11/2025)

Thank you for your response and attachments. Having reviewed the disclosure provided, I consider EE's response to my Subject Access Request dated 26 November 2025 to be incomplete under UK GDPR Articles 12 and 15. Please treat this letter as a request to remedy the gaps, and to clearly identify any information you contend is not held and/or withheld (including the legal basis relied upon).

On 24 December 2025, EE notified me of an extension under Article 12(3) UK GDPR and stated it aimed to complete my SAR by 26 February 2026. The disclosure provided on 12 February 2026 remains incomplete for the reasons set out below, and I require full compliance by the extended deadline.

This letter is not a new subject access request; it is a request for EE to complete and clarify its response to my SAR.

1. Article 15(1) information (not satisfied by a general privacy policy link)

Please provide the information required by UK GDPR Article 15(1) in relation to my personal data and this matter, including the purposes of processing, categories of personal data, recipients/categories of recipients, retention, sources, and any Article 15(1)(h) information relating to automated decision-making/profiling. A link to a general privacy policy does not, without more, address these points in a case-specific manner.

2. Credit assessment/CRA-related data and decisioning records (SAR §2.1; §7.1.5)

My SAR requested the personal data underlying the credit/eligibility assessment and the subsequent cancellation/decline decision(s), including any CRA-derived data held by EE. Your complaint correspondence states that you are "unable to provide... specific information as to why you failed the criteria for the Device Finance." That statement does not explain what personal data EE holds, nor does it identify any exemption under the Data Protection Act 2018.

Please provide, for the relevant period, copies of personal data held relating to CRA searches/results (to the extent held by EE), decision outputs, reason codes/risk flags, eligibility

criteria results, audit trail entries, manual review notes (if any), and the timestamps/records showing why/when the application/order status moved from accepted to cancelled/declined.

If you contend that certain items are not held by EE (e.g., CRA reports), please confirm that explicitly and identify what CRA-related data (if any) EE does hold (e.g., decision outputs, summary indicators, reason codes).

3. Internal communications and case handling records (SAR §2.3.3–2.3.4; §2.4)

My SAR requested internal communications between relevant teams (including Sales, offline order processing, Credit Referrals, and Executive Complaints) and related case notes/records. The material supplied to date appears limited to account notes and external-facing correspondence.

Please disclose any internal emails, messages, notes, or other internal records that constitute my personal data and that relate to: (i) the assessment of my application/eligibility; (ii) order processing, verification, and cancellation; and (iii) complaint handling and any internal escalation or decision-making.

4. FOS communications and representations (SAR §2.4.7–2.4.9)

My SAR requested all communications with, submissions to, and representations made to the Financial Ombudsman Service regarding my complaint (PNX-5712039-X0S5). The account notes refer to the FOS matter and issues around “resolution,” but the underlying communications have not been disclosed.

Please provide copies of all personal data comprising communications/submissions to FOS, and internal records evidencing what was said/sent to FOS (including any statement that the complaint was resolved and the basis for it).

5. System and technical records/audit trails (SAR §2.1.7–2.1.8; §2.2.2–2.2.4; §2.7.4)

Under clauses 2.1.7, 2.1.8, 2.2.2, 2.2.4 and 2.7.4 of my SAR dated 26 November 2025, I requested the complete system audit trail and associated system records/entries for order xko299591893 and BAN 225386871. The material supplied to date does not satisfy those clauses.

Please provide the full system audit trail/log extracts (or system exports) showing the entire lifecycle of order xko299591893, including order creation/submission, identity and credit verification steps, all system-generated and manual decision entries (including any manual review/override), all status changes (including any movement from “accepted” to “cancelled/declined”), and cancellation/refund processing, with timestamps, the source system, and the operator identifier and/or role/team for each entry (redacted only where a lawful exemption applies).

If EE contends that any responsive audit trail, log data, or system record is not held or cannot be produced (including because it has been deleted), please confirm this explicitly, identify the specific record/category affected, and provide (i) the date and reason it ceased to be held, (ii) the applicable retention policy or schedule relied upon, and (iii) confirmation of what steps were taken to preserve responsive data once my SAR was received.

I note that the ability to provide this audit trail is particularly relevant to my ongoing complaint with the Financial Ombudsman Service, where EE’s contradictory positions regarding acceptance/cancellation of my application are in dispute. This request relates solely to personal data within those systems.

6. Redactions/staff names

You state you cannot provide names of EE individuals within the customer account notes disclosed in response to my request (including those provided in *Account Notes.pdf*).

Please confirm the specific exemption(s) relied upon for each category of redaction/withholding, whether EE considered partial disclosure, and provide, at minimum, job titles/teams/roles for individuals who accessed or made decisions regarding my application/complaint.

7. Index/schedule of disclosure and omissions (SAR §8)

Please provide a document list/index (or equivalent schedule) identifying each item disclosed, its format, the source system, and a clause-by-clause confirmation of what has not been provided and why (including the legal basis/exemption for each category withheld).

8. Searches undertaken

For the avoidance of doubt, I expect EE's searches to include all systems reasonably likely to contain personal data relating to my order, credit/eligibility decisioning, complaint handling, and any liaison with the Financial Ombudsman Service, including any legacy and successor systems.

Please confirm whether your searches included (as applicable) systems commonly used within BT/EE operations for these functions, including, but not limited to: Ensemble (Amdocs); Siebel; ServiceNow; Albert/eGain; Sherlock; and Lightico (or any successor or replacement systems). If any of these were not searched, please identify the system(s) searched instead for the relevant function(s) and explain why.

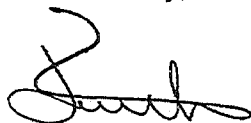
For context, I am a former BT Group employee and was dual-skilled across EE inbound sales and BT Consumer inbound sales (OneView/Consumer/Agent systems), so I am familiar with the systems used to process orders, credit/eligibility decisions, and complaint handling.

Please confirm, briefly, the teams/functions consulted in responding to my SAR, the date range applied, and the identifiers/search terms used (e.g., my name, BAN, order reference, email address, telephone numbers, and any internal case references).

Please provide the above without undue delay and, in any event, within 14 days or by 26 February 2026, whichever is sooner. If you contend that any item is not personal data, is not held, or is exempt, please confirm that explicitly and explain the basis, including the relevant Data Protection Act 2018 exemption and how it applies.

If I do not receive a complete response, I will consider escalating the matter to the Information Commissioner's Office.

Yours faithfully,



Jack Whittle