

Jack Whittle
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Wednesday, 26 November 2025

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

Delivered by email: cpo@bt.com

RE: SUBJECT ACCESS REQUEST UNDER UK GDPR – URGENT

Account Reference: BAN 225386871

Order Reference: xko299591893

Matter: Device Finance Agreement Dispute & FOS Complaint

Dear Data Protection Officer,

PURPOSE OF THIS CORRESPONDENCE

I am writing to submit a formal Subject Access Request pursuant to Article 15 of the UK General Data Protection Regulation (UK GDPR) and Section 7 of the Data Protection Act 2018.

This request is made in the context of serious ongoing regulatory proceedings and is of critical importance to my legal position.

BACKGROUND CONTEXT

1. In July 2025, I entered into what I believe to be a binding Consumer Credit Act regulated Fixed Sum Loan Agreement with EE Limited for the purchase of an iPhone 16 Pro Max.
2. Despite passing credit checks, signing a complete CCA agreement, and paying a required £30 advance payment, EE subsequently cancelled my order without adequate justification or transparency.
3. I have pursued a formal complaint through EE's internal procedures, which has proven wholly unsatisfactory and resulted in conflicting and contradictory information from multiple EE departments.

4. I have now escalated this matter to the Financial Ombudsman Service and am actively considering legal proceedings for breach of contract and regulatory non-compliance.

PURPOSE OF THIS SAR

The enclosed Subject Access Request is comprehensive and detailed because I require complete visibility of:

- **All credit assessment processes and decision-making** that led to the approval and subsequent cancellation of my application
- **All internal communications** that demonstrate the contradictory positions taken by different EE departments
- **All records relating to complaint handling** including EE's communications with the Financial Ombudsman Service
- **Complete evidence** to assess whether EE has complied with Consumer Credit Act 1974 obligations and FCA regulations

This information is essential to:

1. Understanding the basis for EE's cancellation of what I consider to be a formed and binding contract
2. Evaluating regulatory compliance with CCA 1974, FCA CONC rules, and DISP complaint handling requirements
3. Preparing a comprehensive case for the Financial Ombudsman Service
4. Assessing the merits of potential legal action for breach of contract and regulatory violations

STRUCTURE OF THIS REQUEST

The enclosed Subject Access Request is structured in **11 numbered sections** for clarity and precision:

Sections 1-2: Legal basis and comprehensive categories of data required

Sections 3-5: Compliance requirements, delivery format, and identity verification

Sections 6-7: Context, urgency, and statutory obligations

Section 8: Requirement for Data Disclosure Schedule (critical for verifying completeness)

Sections 9-11: Confirmation, contact details, and declaration

I have structured this request in contract-style format with hierarchical numbering (e.g., 2.3.1.1) to ensure absolute clarity and to facilitate easy cross-referencing in any subsequent proceedings.

KEY REQUIREMENTS

Data Disclosure Schedule (Section 8)

I draw particular attention to **Section 8**, which requires EE to provide a comprehensive Data Disclosure Schedule alongside the disclosed data. This schedule must:

- Map each item of disclosed data to the corresponding request clause
- Identify format and source system for each item
- Explain any omissions with legal justification

This is essential for verifying completeness and identifying any gaps in disclosure.

Timeline Compliance

Under UK GDPR Article 12(3), you must respond to this request **within one calendar month** of receipt. Given the legal context, I require strict compliance with this statutory deadline.

Acknowledgment Required

Please acknowledge receipt within **48 hours** and confirm:

1. The exact date by which you will provide the complete response
2. The identity and contact details of the person handling this request
3. Any clarification needs (though the request is comprehensive)

IMPORTANCE & CONSEQUENCES

This is not a routine Subject Access Request. It is made in the context of:

1. **Active FOS Investigation:** An investigator has been assigned and is reviewing EE's conduct
2. **Potential Legal Proceedings:** Breach of contract and regulatory non-compliance claims
3. **Regulatory Concerns:** Possible referral to FCA regarding systematic process failures

The information requested will be carefully reviewed and may be used in:

- Financial Ombudsman Service proceedings
- Court proceedings for breach of contract
- Regulatory complaints to the FCA and/or ICO
- Public disclosure if appropriate to protect other consumers

Failure to provide complete, accurate, and timely disclosure will be treated with utmost seriousness and may result in:

- Complaint to the Information Commissioner's Office
- Court application to compel compliance
- Evidence of non-cooperation in FOS and legal proceedings
- Adverse inferences drawn regarding the content of undisclosed material

PROFESSIONAL EXPECTATIONS

I expect EE Limited to:

1. **Treat this request with appropriate urgency and seriousness**
2. **Conduct a thorough and diligent search** across all relevant systems and departments
3. **Provide complete disclosure** without selective omission
4. **Include the required Data Disclosure Schedule** to verify completeness
5. **Respond within the statutory one-month deadline**
6. **Maintain professionalism** in all communications regarding this matter

DELIVERY METHOD

As specified in Section 4 of the enclosed request, I require delivery via:

- **Secure email** to jackwhittle@zoho.com, or
- **Encrypted file transfer service** if data volume exceeds email attachment limits

Please confirm the method you will use when acknowledging this request.

DECLARATION

I confirm that:

1. This Subject Access Request is made in good faith for legitimate purposes
2. The information requested relates to my personal data and legal rights
3. I am the data subject and have provided identity verification details in Section 5
4. I understand my rights under UK GDPR and Data Protection Act 2018
5. I reserve all legal rights including escalation to ICO and courts if necessary

NEXT STEPS

Please:

1. **Acknowledge receipt** within 48 hours to jackwhittle@zoho.com
2. **Confirm compliance timeline** (must be within one month)
3. **Identify the handler** responsible for this request
4. **Provide complete disclosure** with Data Disclosure Schedule within statutory deadline

Should you have any genuine clarification questions, please contact me immediately using the details below. However, I emphasise that the enclosed request is comprehensive, specific, and legally compliant.

I look forward to your prompt acknowledgment and full compliance with this lawful request.

Yours formally,

Jack Whittle

Contact Details:

Email: jackwhittle@zoho.com (preferred)

Telephone: 07377 077930

Address: 266 Station Road, Bamber Bridge, Preston, PR5 6EB

Enclosure:

Subject Access Request Under UK GDPR (formal request document)

CC (for record):

- Financial Ombudsman Service (case file)
- Personal legal records

SUBJECT ACCESS REQUEST UNDER UK GDPR FORMAL NOTICE REQUIRING URGENT RESPONSE

TO: Data Protection Officer, EE Limited
FROM: Jack Whittle
DATE: Wednesday, 26 November 2025
REFERENCE: BAN 225386871 | Order xko299591893

1. INTRODUCTION AND LEGAL BASIS

1.1 I am writing to make a formal Subject Access Request under Article 15 of the UK General Data Protection Regulation (UK GDPR) and Section 7 of the Data Protection Act 2018.

1.2 This request relates to an ongoing complaint with the Financial Ombudsman Service and potential legal proceedings.

1.3 I require complete disclosure of all personal data EE Limited holds concerning me in relation to the following:

1.3.1 Application Reference: xko299591893

1.3.2 Billing Account Number (BAN): 225386871

1.3.3 Date Range: 23 July 2025 to present

1.3.4 Subject Matter: Device Finance Agreement application, credit assessment, order cancellation, and subsequent complaint handling

2. SPECIFIC CATEGORIES OF DATA REQUIRED

2.1 Application & Credit Assessment Records

2.1.1 Complete credit application file and all associated documentation

2.1.2 Initial credit check results conducted on 23 July 2025

2.1.3 Credit reference agency reports obtained from Equifax and/or Experian

2.1.4 Credit scoring matrices, decision algorithms, and assessment criteria applied

2.1.5 Manual review records including reviewer identity, timestamp, and decision rationale

2.1.6 Any secondary or post-approval assessments conducted

2.1.7 All system-generated credit decisions with complete audit trails and timestamps

2.1.8 Records showing why application status changed from "accepted" to "cancelled"

2.2 Contract Formation & Order Processing

2.2.1 Digital signature records for the Fixed Sum Loan Agreement (Consumer Credit Act regulated agreement) signed on 23 July 2025

2.2.2 Complete system audit trail for order xko299591893 from creation through cancellation

- 2.2.3 Payment processing records for £30 advance payment including authorization and acceptance records
- 2.2.4 All system logs documenting order status changes with timestamps
- 2.2.5 Contract execution records or documentation showing agreement formation
- 2.2.6 Device Finance Agreement terms presented to me during the application process
- 2.2.7 Refund processing documentation for the £30 advance payment
- 2.2.8 Any records indicating why order was marked as "not processed" despite confirmations

2.3 Communications & Call Records

2.3.1 **All call recordings** between myself and EE from 23 July 2025 onwards, specifically including:

- 2.3.1.1 Call with advisor "Dan" on 23 July 2025
- 2.3.1.2 All subsequent calls to Customer Services, Executive Complaints, and Credit Referrals
- 2.3.2 Complete call transcripts and advisor screen notes from all interactions
- 2.3.3 Internal emails, messages, or communications between EE departments regarding my application, order, or complaint
- 2.3.4 Communications between Sales, Credit Referrals, Executive Complaints, and any other departments
- 2.3.5 All SMS messages sent to mobile numbers 07377077930 and 01772984878
- 2.3.6 All emails sent to jackwhittle@zoho.com
- 2.3.7 Any automated system notifications or alerts generated

2.4 Complaint Handling Records

- 2.4.1 Complete complaint case file from 24 July 2025 onwards (initial complaint to Claire Gillies)
- 2.4.2 All case notes, assessments, and internal communications from Doug Sykes (Executive Complaints)
- 2.4.3 Complete file and correspondence from Lee Fairlamb (Credit Referrals)
- 2.4.4 Decision-making records for the £50 goodwill payment offer
- 2.4.5 Records of my acceptance of £50 payment on "without prejudice" basis with stated conditions
- 2.4.6 EE's acknowledgment and acceptance of those conditions dated 25 August 2025
- 2.4.7 **All communications with or submissions to the Financial Ombudsman Service** regarding my complaint
- 2.4.8 Any statements, representations, or documents provided to FOS
- 2.4.9 Records showing basis for claiming complaint was "resolved" to FOS

2.4.10 Internal assessment of whether complaint handling complied with FCA DISP rules

2.5 Policy & Procedure Documentation

2.5.1 Credit assessment policies and procedures in effect during July 2025

2.5.2 Device Finance Agreement eligibility criteria applicable to my application

2.5.3 Process documentation for "manual reviews" or secondary credit assessments

2.5.4 Policies governing when orders can be cancelled post-signature and post-payment

2.5.5 Complaint handling procedures and escalation protocols

2.5.6 Policies on "without prejudice" settlements and conditions

2.5.7 Guidelines on communications with regulatory bodies (FOS/FCA)

2.6 Personnel & Training Records (Relating to My Case)

2.6.1 Names, job titles, and departments of all staff members who accessed, handled, or made decisions regarding my application or complaint

2.6.2 Training records demonstrating Consumer Credit Act 1974 compliance training for staff involved

2.6.3 Any performance management records relating to handling of my case

2.7 System & Technical Records

2.7.1 Screenshots or exports showing my account status at various stages

2.7.2 System error logs or technical issues recorded during my application process

2.7.3 Any records indicating system-generated confirmations were sent "in error"

2.7.4 Database entries or modifications relating to order xko299591893

3. LEGAL BASIS & COMPLIANCE REQUIREMENTS

3.1 This Subject Access Request is made pursuant to:

3.1.1 UK GDPR Article 15 (Right of access by the data subject)

3.1.2 Data Protection Act 2018, Section 7

3.2 You are required to respond **within one calendar month** of receipt of this request (UK GDPR Article 12(3)).

3.3 **No fee is payable** for this request as it is neither manifestly unfounded nor excessive (UK GDPR Article 12(5)).

4. FORMAT & DELIVERY REQUIREMENTS

4.1 Please provide all requested data in the following format:

4.1.1 **Documents:** PDF format where possible

4.1.2 **Call recordings:** Audio files (MP3 or WAV format)

- 4.1.3 **Emails/correspondence:** Native format (MSG, EML) or PDF
 - 4.1.4 **System records:** Structured format (Excel, CSV) or PDF with clear timestamps
 - 4.1.5 **Delivery method:** Secure email to jackwhittle@zoho.com or encrypted file transfer
 - 4.2 If certain data cannot be provided in these formats, please explain why and provide in the most accessible alternative format.
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5. IDENTITY VERIFICATION

5.1 To verify my identity, I provide the following details:

- 5.1.1 **Full Name:** Jack Whittle
- 5.1.2 **Address:** 266 Station Road, Bamber Bridge, Preston, PR5 6EB
- 5.1.3 **Date of Birth:** 11/08/1994
- 5.1.4 **Account/BAN:** 225386871
- 5.1.5 **Order Reference:** xko299591893
- 5.1.6 **Contact Numbers:** 07377077930 / 01772984878
- 5.1.7 **Email:** jackwhittle@zoho.com

5.2 If you require additional verification, please contact me immediately using the details above.

6. CONTEXT & URGENCY

6.1 This request is made in the context of:

- 6.1.1 An active complaint with the Financial Ombudsman Service (FOS reference: PNX-5712039-X0S5)
- 6.1.2 EE's potential breach of a Consumer Credit Act regulated agreement
- 6.1.3 Consideration of legal proceedings for breach of contract and regulatory non-compliance

6.2 The information requested is essential to:

- 6.2.1 Understanding the basis for EE's decisions regarding my application
 - 6.2.2 Assessing compliance with Consumer Credit Act 1974 and FCA regulations
 - 6.2.3 Evaluating EE's complaint handling against DISP requirements
 - 6.2.4 Preparing for potential legal action
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7. YOUR STATUTORY OBLIGATIONS

7.1 Please note your statutory obligations under UK GDPR:

7.1.1 **Respond within one month** of receipt (extendable by two months only in complex cases, with notification) - Article 12(3)

7.1.2 **Provide information in a concise, transparent, intelligible form** using clear and plain language - Article 12(1)

7.1.3 **Supply a copy of personal data free of charge** unless request is manifestly unfounded or excessive - Article 12(5)

7.1.4 **Provide information on recipients** to whom my data has been disclosed (including FOS, FCA, credit reference agencies) - Article 15(1)(c)

7.1.5 **Explain any automated decision-making** including credit scoring logic and significance - Article 15(1)(h)

7.2 Failure to comply with this request within the statutory timeframe may result in:

7.2.1 Complaint to the Information Commissioner's Office (ICO)

7.2.2 Application to the Court for an order to compel compliance

7.2.3 Use of non-compliance as evidence in legal proceedings

8. DATA DISCLOSURE SCHEDULE

8.1 EE shall provide, alongside the disclosed data, a comprehensive Data Disclosure Schedule that systematically maps and organises all material supplied in response to this request.

8.2 The Data Disclosure Schedule shall include the following information:

8.2.1 Identification of each item or category of personal data disclosed

8.2.2 Statement of the format in which each item is supplied (e.g., PDF, MP3, CSV, MSG)

8.2.3 Specification of the system, database, source or internal location from which the data was retrieved

8.2.4 Cross-reference to the corresponding clause of this request (Sections 2.1-2.7) to which each disclosed item relates

8.2.5 Clear identification of any clause or sub-clause (from Sections 2.1-2.7) for which EE has supplied no data, accompanied by a detailed explanation for each such omission including legal basis if applicable

8.3 The Data Disclosure Schedule shall be provided as a standalone document in PDF or Excel format and delivered simultaneously with the disclosed data package.

8.4 Failure to provide a compliant Data Disclosure Schedule will be treated as an incomplete response to this Subject Access Request.

9. CONFIRMATION OF RECEIPT REQUIRED

9.1 Please acknowledge receipt of this Subject Access Request within **48 hours** and confirm:

9.1.1 The date by which you will provide the requested information

9.1.2 The identity of the person responsible for handling this request

9.1.3 Any clarifications needed (though this request is comprehensive and specific)

10. CONTACT DETAILS

10.1 All correspondence regarding this request should be directed to:

10.1.1 **Email:** jackwhittle@zoho.com (preferred)

10.1.2 **Telephone:** 07377 077930

10.1.3 **Postal Address:** 266 Station Road, Bamber Bridge, Preston, PR5 6EB

11. DECLARATION

11.1 I expect full compliance with this lawful request.

11.2 I reserve all rights including the right to pursue regulatory complaints and legal action should EE fail to meet its statutory obligations.

EXECUTED BY:

Jack Whittle

Date: Wednesday, 26 November 2025

Enclosures: None required (identity verification details provided in Section 5)

CC (for record):

- Financial Ombudsman Service (case file)
- Personal legal records