

Thank you for your email of 22 January 2018.

Our view

I have considered the information available in relation to this complaint and I am of the view that [REDACTED] has complied with its data protection obligations.

You have explained that following receipt of our email you looked at both customer's – [REDACTED] ("Customer A") and [REDACTED] ("Customer B") – histories in its fraud engine. You provided us with the following information:

1. Both customers logged on from the same device (Device ID [REDACTED]) – Customer A logged onto this device on the 11 July 2018 and the 26 July 2018, Customer B logged onto this device on the 30 July 2018.
2. Both customers have logged on from the same IP address: IP Address [REDACTED] – Customer A logged on from this IP address on the 26 July 2018, Customer B logged on from this IP address on the 30 July 2018.

You have also explained that a user's account on the [REDACTED] website does not store payment card details. Instead, "payment tokens" are stored in a database – a payment token is a unique identifier for a payment card. Your organisation's fraud engine and its payment gateway will each give a payment card a payment token. Payment tokens are not shared with users.

It is my understanding that the fraud engine will give a payment card the same payment token even if that payment card is used by many different accounts or users. The payment gateway will give each individual account a separate token even if several accounts use the same payment card.

If a user transacts on the website, payment tokens are used to make a call to the payment gateway. Of a user's 15 or 16 digit card number (depending on the card type), the only information that is logged in a user's account and that a user would see are the last two digits of their payment card.

We are satisfied with the response you have provided and based on the information we now have available it appears likely that the data subject has used the same device as a third party.

We will now close this case with no further action. Thank you for your cooperation whilst we dealt with the matter.

Yours sincerely


Lead Case officer
Information Commissioner's Office


ICO Statement

You should be aware that the Information Commissioner often receives request for copies of the letters we send and receive when dealing with casework. Not only are we obliged to deal with these in accordance with the access provisions of the data protection framework and the Freedom of Information Act 2000, it is in the public interest that we are open and transparent and accountable for the work that we do.

For information about what we do with personal data see our privacy notice at www.ico.org.uk/privacy-notice