

IP Processing

The purpose of this document is to provide information about the IP Processing we undertake as part of the service we provide.

Approved by:	Michelle Sumecki, Director of Data Compliance Chris Willerton, Chief Operating Officer
Internal reference:	DC.006
Version number:	v1.2
Date approved:	23/09/22
Date reviewed:	16/11/23

IP Processing

1. The Process

- We collect all IP addresses via requests made from within our JavaScript installed on customer websites
- We attempt to match the IP to a business within our database (no other information is used for the identification)
- If we cannot identify a business with a high degree of certainty, the IP address remains within our database until it can be identified or is redundant. The IP data we collect is fluid and updated continuously
- If an IP address matches a business, we process other non-personally identifiable information for aggregated website visitor analysis

2. Amazon AWS

- Screen width
- Screen height
- Screen colour
- Browser
- Title
- Location (browser information, not a physical location)
- Referrer

3. Identification of an individual

An IP address can be personal data in some circumstances; this depends on the ability to identify an individual.

The UK regulator for data protection, the ICO, has reviewed our processing and confirmed that our processing has no other way of identifying the IP of any such individual user. Therefore, the processing of IP addresses is not personal data.

4. UK GDPR

As the IP data we collect, process, and store is not considered personal data, UK GDPR does not apply.

23 September 2022

Our reference: [REDACTED]

Dear M Sumecki,

Whilst an IP address can be personal data in some circumstances, we would need to look at your ability to identify any individual from that, and the purposes behind your processing.

As you mention you only check this data against known business and have no other way of identifying this IP to any such individual user, nor is that your purpose.

Therefore your processing of IP addresses would not appear to be the processing of personal data.

Furthermore, and touching specifically on [recital 30 from the UK GDPR](#), which is the only part of the legislation that refers to IP addresses, or other online identifiers:

Natural persons may be associated with online identifiers provided by their devices, applications, tools and protocols, such as internet protocol addresses, cookie identifiers or other identifiers such as radio frequency identification tags. This may leave traces which, in particular when combined with unique identifiers and other information received by the servers, may be used to create profiles of the natural persons and identify them.

The intention here is clear, a natural person may be identified using an IP address. It does not however state an IP address is always personal data or an identifier.

You must also consider the purpose of processing. If you are not using the data to make a decision on an individual it is unlikely to be personal data.

This comes from the definition of personal data – data that both identifies and relates to an individual. In your example the data never relates to an individual, nor is the purpose to try and relate it to an individual, for that reason I would strongly suggest this would not be personal data.

Therefore in closing, an IP address can be personal data in the right circumstances, but in yours, where you are using it to identify organisations, it would not be personal data.

Yours sincerely

[REDACTED]

Case Officer
Information Commissioner's Office

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

T. 0330 414 6464 ico.org.uk twitter.com/iconews

Please consider the environment before printing this email

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