

# Internal Audit and Counter Fraud

The City of London Corporation is committed to protecting and respecting your personal data. This Privacy Notice explains how we use information about you and how we protect your privacy in connection with providing an Internal Audit and Counter Fraud service to the City of London Corporation and its institutions, where the personal data is used for Counter Fraud activities the data is used for proactive and reactive counter fraud investigation activity, including analysis of personal data for data matching activities and assessment of fraud risk , For full details on how the City of London Corporation processes personal information more generally, please visit [www.cityoflondon.gov.uk/privacy](http://www.cityoflondon.gov.uk/privacy)

If you have any concerns or questions about how we look after your personal information, please contact the City of London's Data Protection Officer, also the Comptroller and City Solicitor, Michael Cogher, at [information.officer@cityoflondon.gov.uk](mailto:information.officer@cityoflondon.gov.uk).

Please note - this Privacy Notice was updated on 29 April 2026

**Departments this notice applies to personal data held by:** All City of London Corporation departments and institutions.

## 1. Your personal data

Personal data is anything that directly or indirectly identifies and relates to a living person, such as a name, address, telephone number, date of birth, your gender, age, how the application was made etc.

All personal data collected will be evaluated periodically and only kept as long as necessary or in line with legal requirements.

We collect information about you as provided to us

- Names
- Date of birth
- National Insurance number (NINO)
- Contact details
- Financial data – bank account details
- Gender
- Sole Trader data
- Business rates data
- Department
- Payroll information
- Contract information

In addition to this some information is considered ‘special category data and needs more protection due to its sensitivity. This includes any information about an identifiable individual that can reveal their sexuality and sexual health, religious or philosophical beliefs, racial origin, ethnicity, physical or mental health, trade union membership, political opinion, genetic/biometric data.

We may also collect, store and use the following “special category data” which is of a more sensitive nature:

- Health data
- Sexual life or Sexual orientation

## **2. Why do we need your personal data?**

We will collect and process the above data about you:

- To undertake internal and external investigations into Fraud, corruption, theft, financial, and misconduct.
- To process personal data in relation to the National Fraud Initiative (NFI).
- To process personal data in relation to the London NFI fraud hub.
- To administer civil and criminal actions following an investigation.

## **3. How the law allows us to use your personal data.**

There are several legal reasons why we will need to collect and use your personal data in different circumstances.

Generally, we collect and use personal data where:

- Necessary for the performance of a legal obligation
- Necessary for the performance of a task carried out in the public interest or in the exercise of official authority
- Legitimate interest

## **4. Consent**

If we have consent to use your and your guest(s) personal data for any particular reason, you both have the right to remove your consent at any time. If you want to remove your consent, please contact [information.officer@cityoflondon.gov.uk](mailto:information.officer@cityoflondon.gov.uk) and tell us about the personal data being used and where it is being used or the department using this data, so we can respond to your request.

## **5. Your rights regarding your personal data**

The law gives you a number of rights in relation to what personal data is used by the City of London, and how it is used. These rights are listed below, and full details can be found in the [City of London's Data Subject Rights Policy](#).

### Your Rights

You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your personal data to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us at [information.officer@cityoflondon.gov.uk](mailto:information.officer@cityoflondon.gov.uk)

Our Sites may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites and any services that may be accessible through them have their own privacy policies and that we do not accept any responsibility or liability for these policies or for any personal data that may be collected through these websites or services, such as contact and location data. Please check these policies before you submit any personal data to these websites or use these services.

You can ask us to:

- provide you with a copy of the personal data that we hold about you;
- correct personal data about you which you think is inaccurate;
- delete personal data about you if you think we no longer should be using it;
- stop using your personal data if you think it is wrong, until it is corrected;
- transfer your personal data to another provider in a commonly used format;
- not use automated decision-making processes to make decisions about you.

## **6. Who do we share your personal data with?**

In some circumstances, we use other organisations to either store personal data or use it to help deliver our services to you. Where we have these arrangements, there is always an agreement in place to make sure that the organisation complies with data protection law.

Please note that we will also share your data with the Livery Companies – but only in instances where the applicant of the Freedom is a member of that company.

Sometimes we have a legal duty to provide personal data to other organisations.

We may also share your personal data when we consider/believe that there is a good reason to do so, which is more important than protecting your privacy. This doesn't happen often, but in these circumstances, we may share your personal data:

- to find and stop crime and fraud; or
- if there are serious risks to the public, our staff or to other professionals; or
- to protect a child; or
- to protect adults who are thought to be at risk, for example if they are frail, confused or cannot understand what is happening to them.

For all these reasons, the risk must be serious before we can override your right to privacy.

If we are worried about your physical safety or feel we need to take action to protect you from being harmed in other ways, we will discuss this with you and, if possible, get your permission to tell others about your situation before doing so.

We may still share your personal data if we believe the risk to others is serious enough to do so.

If this is the case, we will make sure that we record what personal data we share and our reasons for doing so. We will let you know what we have done and why, if we think it is safe to do so.

- Personal data may be shared with the Cabinet Office and their contracted supplier (Synectics solutions) for the purpose of the National Fraud initiative.
- National Anti-Fraud Network (NAFN), as hosted by Tameside borough council for the purpose of undertaking intelligence and information services for investigations.
- Internal departments for the purposes of carrying out investigations
- With the London Councils and the London Museum where appropriate for the provision of internal audit services
- We are currently participating in a pilot scheme with the Public Sector Fraud Authority (PSFA) which involves the secure sharing of social housing tenancy data to identify the fraudulent sub-letting of social housing

## **7. How do we protect your personal data.**

We have a legal duty to make sure we hold your personal data (on paper and electronically) in a secure way, and to only make it available to those who have a right to see them. Examples of our security include:

- Encryption, meaning that personal data is hidden so that it cannot be read without special knowledge (such as a password).
- Controlling access to systems and networks allows us to stop people who are not allowed to view your personal data from getting access to it
- Training for our staff allows us to make them aware of how to handle personal data, and how and when to report when something goes wrong

You can find more details of our Information Security expectations in our IT Security Policy.

## **8. Where we store your personal data**

The data that we collect from you will be held within the UK unless we are required to process your data outside of the UK.

All data held and processed within the UK will be processed by staff who work for us or for one of our providers.

By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

Unfortunately, the transmission of personal data via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to Our Sites; any transmission is at your own risk. Once we have received your personal data, we will use strict procedures and security features to try to prevent unauthorised access.

We will collect and store personal data on your Device using application data caches and other technology.

Some processing may involve transfers outside of the UK/EEA. Where this occurs the sharing is protected by the UK International Data Transfer Agreement (IDTA) to ensure your data receives the same level of protection as it does in the UK.

## **9. How long do we keep your personal data?**

All personal data collected will be evaluated periodically and only kept as long as necessary or in line with legal requirements.

- Where personal data is used for investigations which have resulted in a sanction the data will be held for 6 years following the closure of the matter.
- Where personal data is used for investigations which have not resulted in a sanction the data will be held for 3 years following the closure of the matter.
- Where personal data is held for National Fraud initiative and the London NFI Fraud hub this data will be held in accordance with the NFI retention period which can be accessed from :  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/741323/The-NFI-Data-Deletion-Schedule.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/741323/The-NFI-Data-Deletion-Schedule.pdf)
- Where the data is held for internal audit purposes this data will be held for 6 financial years +1 financial year.

## **10. Related links**

- [cctv.pdf](#)
- [Images and Recordings Privacy Notice](#)

- [Privacy Policy - National Anti Fraud Network](#)