

Privacy Notice Extension

For the 'Asset Recovery Dataset'

v1.0 | 8th June 2026

General Information

A number of organisations and agencies which are engaged in asset recovery work using proceeds of crime legislation and in particular the Proceeds of Crime Act of 2002 (POCA) have established joint controllership arrangements for a collective dataset described as the 'Asset Recovery Dataset'.

Joint Controllership is a specific arrangement where 'jointly with another [controller]' the controllers' have determined the 'purposes and means of the processing of personal data'. This arrangement is described within the Joint Controllers' (JCs') published Joint Controllership Agreement (JCA). The JCA identifies the participating controllers and sets out in general terms their agreed roles and responsibilities under the agreement. The JCA also describes the scope of the dataset as data collected about an individual may at times be being processed by a controller independently. For example, this might happen where a person has had their data recorded independently by a JC and subsequently that data or a part of it is added to the dataset under joint control.

This 'Privacy Notice Extension' has been developed specifically to provide information related to the processing of personal data held within the Asset Recovery Dataset and should be read as an extension to privacy information already provided by controllers individually. **Readers must therefore also read the information provided directly by the relevant individual controllers as the primary source of information for the specific organisation or agency they have an interest in.**

This document sets out:

- Why the JCs are able to process your information;
- What purpose the JCs are processing it for;
- Whether you have to provide it to the JCs;
- How long the JCs store it for;
- Whether there are other recipients of your personal information;
- Whether the JCs intend to transfer it to another country; and
- Whether the JCs carry out automated decision-making or profiling.

Controllers' Contact Details

The contact details of the JCs are set out in **Schedule 1 of the JCA for the Asset Recovery Dataset**.

Data Protection Officers' Contact details

In compliance with Section 69 of the Data Protection Act 2018 (DPA18), each controller, who is a party to the JCA has appointed a Data Protection Officer. Their contact details may be found by directly accessing the Privacy Notice of the relevant individual controller.

Purposes of the Processing

The aim of the asset recovery scheme within POCA is to deny criminals the use of their assets, recover the proceeds of crime and disrupt and deter criminality. As part of the JCs' statutory functions and other obligations, they engage in activity which arises from or is linked to detecting and deterring Serious and Organised Criminality. This may include the investigation of offences and collection of information and evidence. They do this, particularly, by using the framework and powers established by POCA, which, amongst other things, allows for the restraint and recovery of assets linked to criminality using both criminal and civil proceedings. The processing within scope of this privacy notice supports those objectives.

The Data and Why it is Processed

In order for the JCs to fulfil their obligations it is necessary to investigate the circumstances of the acquisition of assets and whether their possession arose from the proceeds of crime. Information and evidence about victims, witnesses and suspects as well as other individuals connected to the case must be gathered. For example, it is possible that someone entirely innocent of any connection with criminality might have an interest in an asset which is criminally tainted as a proceed of crime. Establishing the facts is essential to ensure that those whose actions are criminal or criminally tainted are prosecuted where possible. Likewise, it is equally important that the innocent are exonerated and where lawfully possible protected from financial loss. Whether prosecution is possible or not, the law provides a means to recover criminal assets so that criminals gain no benefit from their actions and processing of your data supports this objective.

The JCs may obtain information directly from you e.g.:

- in making a complaint connected to criminal activity,

- in providing information in respect of suspicious financial activity or the unexplained wealth of another etc.
- in providing information linked to an asset recovery investigation as a witness, victim or having a financial interest in an asset etc.
- as a result of being under investigation and responding to questions linked either to suspected criminality or the acquisition or accumulation of financial assets without an immediately obvious innocent explanation etc.

The JCs may also obtain personal information about you from other sources. These might include from:

- other Controllers which comprise the Joint Controllership
- other organisations and agencies which engage in asset recovery subject to POCA
- other law enforcement agencies
- other organisations and agencies which any one of the JCs have contacted in the course of their investigations and which have provided personal information in their response
- any bank, financial or other organisation which has a positive obligation to report suspicious financial activity to any one of the JCs.
- private individuals which wish to bring suspicious activity to attention
- another party to an investigation being undertaken by one of the JCs as part of their disclosure.
- public documents and registers e.g. Companies House and the Land registry Office
- etc.

If it is not disproportionate or prejudicial, you will be notified that the JCs' are processing your personal information.

Use and Sharing of Your Personal Data

Your personal information is used in connection with the recovery of assets which fall within scope of the proceeds of crime legislation. Processing is necessary in the course of investigations and other due diligence necessary to link or otherwise dismiss links between an asset and criminal acquisition. Personal data processed by the JCs may also be used to prosecute crime, to execute criminal penalties or undertake civil proceedings.

The JCs may share your personal information but will only do so when this is fair and lawful. In some circumstances there may be a legal obligation to share information e.g. under a court order or where there is a need to cooperate with other authorities and organisations in the course of investigations. In all cases the JCs will have confirmed that there is a lawful basis on which to share the information.

It may be necessary in some circumstances to share your personal information with law enforcement and other organisations including those in third countries. It may also be necessary to share your personal information with others involved in the prosecution of offences and the execution of criminal penalties e.g. external legal counsel, co-defendants and their legal representatives etc. Court cases are held in public and so personal data, including special category data, might be made public during the course of proceedings.

Proceedings may be subject of reporting and the JCs' may seek to publicise cases where there is a public interest in doing so.

Freedom of Information Act and Subject Access Requests are considered on a case by case basis and your information will only be disclosed where there is a legal requirement to do so.

Some records may fall within the scope of the Public Records Act of 1958 if they are of historical significance. Where that is the case, they will be transferred to the National Archives (TNA) in due course.

Your information will not be shared with any third parties for the purposes of direct marketing.

Processors

Data processors are third parties which provide elements of services for controllers. Contracts are in place with the JCs' data processors which means that the processors cannot do anything with your personal information unless the JCs have instructed them to do it. The JCs make use of UK based external processors to host the asset recovery dataset in which data will be held securely. They will not share your personal information with any organisation apart from the JCs.

Processing of the Aset Recovery Dataset does not involve automated decision making or profiling.

Retention of Data

The JCs will retain your data as set out in their retention schedule, 'Schedule 2' to their 'Safeguards for Sensitive Processing Policy'.

Lawful Basis of Processing

The processing of personal data by the JCs is for the 'Law Enforcement Purposes' and must comply with Part 3 of the DPA18 which is a specific part of the Law dealing with Law Enforcement Processing.

The law enforcement purposes which are described under Section 31 of the legislation includes the 'prevention, investigation, detection or prosecution of criminal offences or the execution of criminal penalties, which might include the safeguarding against and the prevention of threats to public security'. The JCs process personal data because it is necessary for the performance of a task carried out for the law enforcement purposes and is undertaken generally in three key areas:

1. Criminal investigations
2. Intelligence
3. Financial recovery

Processing may also include the sensitive processing of special categories of data when it is strictly necessary to do so in which case a condition set out in Schedule 8 to the DPA18 will apply. More detail about this can be found within the JCs' 'Safeguards for Sensitive Processing Policy' (an Appropriate Policy Document (APD)). This policy explains about the JCs' processing of personal data (including sensitive processing) for law enforcement purposes, their procedures for complying with the data protection principles and their policies for retention and erasure of any personal data.

Your Data Protection Rights

Under data protection law, you have certain rights. The rights available to you depend on the reason for which your personal data is processed. Data processed within the Asset Recovery Dataset is processed for the Law Enforcement Purposes which is legislated for under Part 3 of the DPA18.

You have a right to request access to the personal data held about you as well as a right to request that inaccurate data is rectified and that incomplete data is completed. You may also request for your personal data to be erased (or for processing to be restricted) in certain circumstances.

The JCs will provide further information directly to data subjects in specific cases to enable them to exercise their rights. This might be in cases where the JCs' are processing personal data which was collected without their knowledge. This will not be done where doing so would be prejudicial to the JCs' activities in preventing, detecting, investigating or prosecuting criminal offences or in the execution of criminal penalties; or for any other reason set out in Sec. 44 (4) DPA18.

Should you wish to access your rights you are encouraged to submit your Subject Rights request directly to the '**City of London Police**' as **lead controller** and '**contact point**' for Subject Rights:

Email: data.protection@cityoflondon.police.uk

Postal: Information Access Team, City of London Police, 182 Bishopsgate, London EC2M 4NP

You may also make your request to any other controller which is party to the Joint Controllership. More detail may be found within **Schedule 2 of the JCA for the Asset Recovery Dataset**.

Raising a Concern or Complaint

The JCs' operate to high standards when processing personal information. Should you wish to raise a concern or complaint you are encouraged to raise your concern directly with the relevant organisation (see Schedule 1) in the first instance.

If you remain dissatisfied, you may also raise the matter with the Information Commissioner through their office: <https://ico.org.uk/concerns/>

Information Commissioner

The Information Commissioner is the United Kingdom's appointed and independent Regulator responsible for upholding information rights in the public interest.

Should you wish to contact the information commissioner you may write to the Information Commissioner's Office (ICO), Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF Tel: 0303 123 1113