

6. The Commissioner's investigation also determined that the storage of customer passwords as un-salted MD5 hash values was not appropriate. Overall the Commissioner determined that the data controller had not displayed an understanding of good security practice, nor the real risk presented by an internet-based attack.
7. The Commissioner has considered the data controller's compliance with the provisions of the Act in light of this matter. The relevant provision of the Act is the Seventh Data Protection Principle. This Principle is set out in Schedule 1, Part I to the Act.
8. Following consideration of the remedial action that has been taken by the data controller, it is agreed that in consideration of the Commissioner not exercising his powers to serve an Enforcement Notice under section 40 of the Act, the data controller undertakes as follows:

The data controller shall, as from the date of this Undertaking and for so long as similar standards are required by the Act or other successor legislation, ensure that personal data are processed in accordance with the Seventh Data Protection Principle in Part I of Schedule 1 to the Act, and in particular that:

- (1) The data controller shall implement appropriate periodic security testing; the scope of this testing should be determined on the risk presented to the personal data the organisation processes, by no later than the 28 February 2015;**
- (2) The data controller shall determine and implement, in accordance with industry standard, an appropriate and secure method of password storage, by no later than the 28 February 2015;**
- (3) The data controller shall define and implement an appropriate software updates policy. This policy shall, by default, require software to be supported by security updates, and to have those security updates applied as soon as reasonably practicable but no later than 28 February 2015;**
- (4) Compliance with the data controller's policies on data protection and I.T security shall be appropriately and regularly monitored, by no later than the 28 February 2015;**
- (5) The data controller shall implement such other security measures as it deems appropriate to ensure that personal data is protected against unauthorised and**

**unlawful processing, accidental loss, destruction, and/or
damage, by no later than the 28 February 2015.**

Signed

Alan Byrne, Chief Executive

Racing Post

Dated

Signed

Stephen Eckersley, Head of Enforcement

For and on behalf of the Information Commissioner

Dated