HEDDLU
GOGLEDD CYMRU
NORTH WALES
POLICE

Response Date:18/11/2026

2026/1167 - Terenex

In response to your recent request for information regarding;

I am writing to request the following information relating to meetings and contracts
• A list of all meetings the team/department in your force responsible for biometric technology has had with Terenex, or its director Lindsey Chiswick since July 2026
• A copy of any minutes from those meetings
• A copy of any contracts your force has with Terenex

North Wales Police do not hold any information in relation Terenex.

In relation to information relating to the director;
Requests made under Freedom of Information Act (FOIA) are applicant blind, and a Freedom of Information (FOI) request must be treated as such as a public authority will always view any disclosure as into the public domain. This is because, and the data protection rights of a third party would be breached by disclosure.

The provisions in Section 40 (1) to (4) of the Freedom of Information Act exempt personal data from disclosure and Section 1(1) (a) of the FOIA imposes a duty on a public authority to either confirm or deny if it holds information specified in a request.

However, in relation to a request which constitutes the personal data of individual(s) other than the applicant(s) (i.e. the person making the request), section 40(5)(b)(i), further excludes a public authority from complying with the duty imposed by section 1(1)(a) FOIA if complying with that duty would contravene any of the data protection principles under the Data Protection Act 2018 (DPA).

Therefore, the first element that needs to be met before relying on section 40(5) (b) (i) is that the information requested should, if held, constitute the personal data of a third party (i.e. someone other than the person making the request).

Personal data is defined in the DPA as follows:

"…"Personal data" means any information relating to an identified or identifiable living individual (subject to subsection (14)(c)) [and] "Identifiable living individual" means a living individual who can be identified, directly or indirectly, in particular by reference to— (a)an identifier such as a name, an identification number, location data or an online identifier, or (b)one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of the individual."

As FOI requests are disclosures to the world (not just to the applicant making the request), if North Wales Police were to use exemptions against the information requested (rather rely on

the use Section 40 (5)(b)(i)) this would provide the public with information about a certain individual or individuals.

However as Section 40(5) (b) (i) specifically refers to giving confirmation or denial 'to a member of the public' it could be argued that giving confirmation or denial to the requestor would not necessarily contravene any Data Protection Principles. Nevertheless, even if we confirmed that we held the information, and then withheld it under another exemption of the Act (e.g. Section 40 (2)) the confirmation alone would disclose personal data of the Data subject/s.

The next element I have considered is whether confirming or denying if the information requested is held, would contravene any of the Data Protection principles.

The first Data Protection principle states: 'that the processing of personal data for any of the law enforcement purposes must be lawful and fair.' It is our belief that confirmation or denial that North Wales Police hold the information requested would be unfair to those who may/may not fall into the remit of the request, and therefore contravention of the first data protection principle.

This is because simply confirming whether or not North Wales Police holds the information requested would provide personal information, and to do so would not be fair. If North Wales Police confirmed or denied that we held data surrounding an individual/s this would amount to the disclosure of personal data because we would be telling the world something about that individual/s.

Lastly, in terms of the legitimate interests in disclosure, the information requested would be personal to any individual/s it may or may not concern. Therefore, confirmation as to whether or not any information is in fact held would not be of any benefit to the public.

Therefore, in accordance with section 40(5)(b)(i) of the FOIA 2000, I can neither confirm nor deny that this information is held by North Wales Police. This refusal should not be taken to mean that the information you have requested exists or does not exist.

Consequently, in accordance with the Freedom of Information Act 2000, this letter acts as a Refusal Notice under section 17 (1) of the legislation.

THIS INFORMATION HAS BEEN PROVIDED IN RESPONSE TO A REQUEST
UNDER THE FREEDOM OF INFORMATION ACT 2000, AND IS CORRECT AS AT 16/11/2026