



## **The complaint**

Mr S complains that Experian Limited is reporting incorrect information about him on his credit file.

## **What happened**

Mr S has previously complained to the Financial Ombudsman about Experian after it kept changing the way it reported his address. This led to difficulties obtaining statutory credit reports. Mr S previously accepted compensation on the basis that Experian was working to resolve the problem.

Mr S complained again to Experian after he noticed that it had conducted a search for a credit report in mid-February 2023 using his incorrectly spelled address.

Experian responded to say that the search matched the address profile on Mr S's free Experian account. Experian told Mr S how he could amend the address on his profile. Experian agreed that it was showing his address incorrectly on the electoral register information and that it had raised this with its specialist team.

When Mr S complained to the Financial Ombudsman in June 2023, he wanted Experian to allow him to obtain a statutory credit report without entering an incorrectly formatted address. Mr S asked for compensation and either that Experian change its system so that the incorrect address would not reappear or add a notice of correction to his account.

Experian responded to Mr S's complaint to say that while it had amended his address on the electoral roll in response to his earlier complaint, once it received the annual council update of the electoral roll, the address reverted back to the earlier version. Experian said that as this may happen each year, it could set a task to check the information each December/January.

Experian confirmed that it had removed the incorrectly formatted linked address but said it had no impact on Mr S's credit report or score.

Experian explained that as Mr S had previously registered for a free Experian account any searches recorded as 'Experian Consumer Services' searches were created when Mr S's new monthly score was generated on his free Experian account. Experian confirmed that any searches linked to his third party membership, which I will refer to as M, were registered when he generated his monthly report and score via M.

Experian would not supply a direct point of contact for a manager or give him access to its CreditExpert subscription service free of charge. It said Mr S should make contact via the usual channels.

Experian said that it would add a notice of correction but pointed out that this can sometimes deter lenders. Experian said that there is a 200 word limit and certain criteria that any notice must meet.

Experian recognised some failings and delays and for this offered to pay £250 compensation. Experian said that if Mr S thought he had lost out financially due to the different version of his address showing on his electoral roll, it would consider any evidence he supplied to substantiate this.

Our investigator thought that as Experian had corrected Mr S's address and as it would check for future recurrence of the problem, Experian's offer to pay £250 compensation was fair.

Our investigator explained that Experian's systems appear to be altering Mr S's address after his local council provides electoral roll information each year. Experian said that this may happen annually but that it will make a note on its system to review things every year and amend its records as needed.

Mr S then checked his credit reports with the three main credit reference agencies, including Experian, in July 2023. Mr S said that while the reports with two of the agencies were correct, Experian continued to display incorrect information, including a linked address that appeared to have been added in the middle of July 2023.

Mr S was unhappy that he couldn't obtain a statutory credit report from Experian unless he uses an incorrect address. Mr S wanted Experian to place a notice of correction on his credit file to record his correct address.

Mr S wanted Experian to contact all organisations to whom it had supplied information about him since January 2020. Mr S thought it reasonable for Experian to supply its credit expert product to him free of charge so that he could access his credit report without having to input the wrong address.

After Experian responded, our investigator sent Mr S a second view. In summary he said:

- The address link was not a fraudulent linked address but a slightly different version of Mr S's address which did not impact his credit file or credit score
- Experian would not contact every company on behalf of Mr S
- Experian had already offered to provide Mr S's statutory credit report with the correct address format by post
- Experian would not provide the CreditExpert service at no cost and that if Mr S wanted to monitor any changes to his address on the electoral roll, he would have to pay for a subscription service
- Experian was happy to add the notice of correction although it thought the problem had now been resolved
- Experian's system automatically alters Mr S's data, which is unfortunate but not something we can force Experian to fix. However, Experian had offered to manually fix the problem as well as trying to find a permanent solution
- Experian's offer to pay £250 compensation was fair
- If the same problem happens in the future, Mr S would need to raise a separate complaint

Mr S disagreed with the second view. In summary he said:

- Experian has still not corrected his electoral roll information
- A new false address has been added in August 2023
- Experian has added a notice of correction but the wording is incorrect
- While he can't prove he's been affected by the false data, Experian cannot prove he has not been impacted
- the false data has affected insurance applications
- Experian has failed to supply details of how to obtain his statutory credit report by post
- He is still waiting for Experian to respond to his DSAR
- He's surprised that Experian only retains data for two years and notes that it has not even offered to contact businesses going back two years on Mr S's behalf

Our investigator asked Experian why further entries are appearing after the linked address had been removed. Experian responded to say that this was because Mr S had recorded the start of his address in a certain way when applying for his credit report. Experian suggested that Mr S supply the number before the first line of his address. Experian reiterated that this was not having any impact on Mr S's credit report or credit worthiness.

After sharing Experian's response with Mr S, he said he'd not requested a report from Experian. Mr S said he'd received almost 500 pages of documents in response to his DSAR and that these showed the errors in the electoral roll information were due to Experian uploading incorrect information.

Mr S provided a series of documents with a detailed email. He said Experian continued to give different sources for the linked addresses. Mr S said over time Experian has added multiple variations of false addresses as linked addresses.

Mr S was unhappy that Experian wouldn't answer his question about why the format of his name was changed between 2020 and 2021.

Mr S wanted Experian to say whether the false address information used in searches is because the parties conducting the searches have used false addresses or is it because Experian's system has corrupted the data.

Mr S didn't understand why the notice of correction was not worded as agreed. Finally, he wanted Experian to explain why having incorrect electoral roll data won't impact him as Experian's own information states that having incorrect data may make it difficult to get certain financial products.

After reviewing the complaint, I issued a provisional decision on 16 January 2024 which said:

I have decided to issue a provisional decision as Mr S supplied further information to our service after Experian responded to his DSAR. I want to be clear about what I can and can't consider as part of this current complaint. I am also conscious of the

fact that there has been a great deal of information going back and forth, so I want to be sure that I have dealt with the key points as part of my decision.

Mr S has supplied a variety of credit report excerpts from 2020 and 2021 which show that linked address data was supplied by one lender on a particular occasion and then by another lender, also on the same date. The same excerpts also show the variation in linked addresses added by Experian, as well as a change in Mr S's name.

Our investigator has previously told Mr S that we cannot consider his concerns about issues dating back to 2020 and 2021 as Experian sent final responses about his concerns in December 2020 and February 2021. This means that I don't say anything further about the older credit reports.

I don't think there is any dispute that Experian's system has been changing the way that Mr S's address appears on its electoral roll record. Experian has been investigating the reason for this but does not seem to have a firm answer or solution yet. However, Experian has previously offered to check its records each December/January so that it can manually correct any error. Although I understand Mr S's frustration with the situation, I can't require Experian to do more than it already is in terms of trying to find a fix to the problem. Experian has offered to check and update Mr S's electoral record in the future if the problem recurs. I think this is fair in the circumstances.

Mr S is concerned about the format of his name on the electoral roll, saying that Experian has changed the way that his name appears for the period March 2020 to December 2020. I can see from the voters roll information Experian provided towards the end of Mr S's earlier complaint that his name appears one way from March 2020 to December 2020 and then another way from December 2020. I have to say that it is not clear to me why this has happened. I don't see why, if it has not already done so, Experian cannot amend Mr S's electoral roll information so that only two entries appear – one for his current address and another for his previous address. Rather than separate entries with slightly different name formats for March 2020 to December 2020 and December 2020 to the current date.

I know that Mr S thinks Experian can't prove that he's not been impacted by the incorrectly formatted data but I have not seen any evidence to suggest that he has been impacted. As Experian says, any lender which searches Mr S's Experian credit file should see the correct details.

Mr S wants Experian to contact every third party to who has searched his credit file since 2020 but I don't require Experian to do this. As our investigator has already said, if Mr S believes that an incorrect version of his address has led to a declined credit application or caused an economic loss, he can give this evidence to Experian to review further.

Mr S says that Experian's notice of correction is incorrect. If Mr S still wants Experian to place a notice of correction on his credit file, I suggest that he provide the wording he would like to appear so that we can share this with Experian.

Mr S is still concerned about the incorrect linked address that appears on his Experian credit report. An example of this appears on a page headed "Linked Addresses." There is a linked address entry which instead of starting with the number of Mr S's property – starts with the name that should follow after the number.

My understanding is that Mr S refers to this linked address as a fraudulent linked address but it is an alternative format of his address – albeit incorrectly set out. The source for the linked address entry in mid-July 2023 is recorded as “Experian Consumer Services”. My understanding of this – and Experian can correct me if I am wrong– is that when Mr S set up his free Experian account, the address he used didn’t start with the number of his house. Although he has not logged in to this account for some time, the account generates a free monthly credit score. So this “false” address then appears as a linked address entry.

Experian has previously explained to Mr S how he can update his address on the free account. If Mr S has not yet done so, I suggest that he updates his address. If Mr S has already tried and failed, he should let me know when responding to my provisional decision.

Regardless of the linked address entries that Mr S has been seeing, I understand that these will not have had a negative impact on his credit score. So, although Mr S has spent a great deal of time on this complaint, I cannot see that he has been financially impacted due to any mistakes on the part of Experian. This means I agree with our investigator that Experian’s offer to pay £250 compensation is fair.

Finally, Mr S has recently told us of some new issues that he has experienced. These include his name appearing on the electoral register as an almost identical version as appears for the period March 2020 to December 2020 but with the deletion of the word “Mr”. Mr S says that a district council has raised a query although he has never lived in that area. Mr S is unhappy that Experian is not following data protection legislation and that the mistakes have affected his ability to obtain reasonable insurance quotes.

I am sorry that Mr S is still experiencing difficulties with his Experian credit information but I cannot keep adding to his complaint without Experian first having the opportunity to respond to Mr S’s new concerns. I leave it with Mr S to decide whether to raise these new concerns with Experian before coming back to our service if he is still unhappy with its response.

I then set out how Experian should put things right for Mr S.

### **Further submissions**

Experian agreed with my provisional decision but Mr S does not.

Mr S says that the agreed form of wording for the correct notice is already recorded within Experian’s systems. So, he is concerned that I had asked him to provide his suggested wording as part of my provisional decision.

Mr S wants to know why I had not challenged Experian for supplying false evidence as an email it supplied requesting a credit report was an internal one from Experian.

Mr S is unhappy that I did not comment on Experian’s failure to act on complaints other than log them. And that I had not commented on the fact that Experian continued to request personal information so that it could identify Mr S and took several months to supply the information requested under his DSAR.

Mr S asks why a further variation of the Electoral Roll data had appeared.

Mr S wants to know what evidence I would consider about the impact the way his information appears on Experian has had on insurance quotes.

Mr S does not think it acceptable for Experian to offer to supply his credit report by post. He wants Experian to change its systems so that he can access his report online without entering an incorrect address. If Experian is going to supply his credit report by post he wants it to be sent to him on the first working day of each month.

Mr S thinks that Experian has admitted it has been providing inaccurate information from his credit file and that under data protection legislation, it has a duty to inform those it has submitted inaccurate data to.

### **What I've decided – and why**

I've considered all the available evidence and arguments to decide what's fair and reasonable in the circumstances of this complaint.

Mr S has pointed to the many mistakes that Experian has made but the informal nature of our service means I don't think I need to refer to every error when deciding his complaint. That being said, I will try and address some of Mr S's concerns as laid out in his response to my provisional decision.

By suggesting that Mr S provide Experian with details of how he would like the notice of correction to appear, I was not intending to mean that he had not already done this. It was simply that as Mr S thought the wording Experian had used was incorrect, it might be useful for him to explain again how he would like the notice to appear. I don't think this was an unreasonable suggestion and I leave it with Mr S to decide whether he wants to take this up with Experian.

On the question of the entry which was created on Mr S's credit report, for which Experian supplied a screen print detailing a £2 charge and an email address other than Mr S. Experian says that the information was generated automatically by its system after it created the DSAR for Mr S. The email address belongs to the agent who raised the DSAR. I hope that this is a helpful explanation for Mr S.

If Mr S remains unhappy about the way that Experian dealt with his DSAR, he can raise these concerns with the ICO. As a general observation, given that Experian holds personal financial information about Mr S, I don't consider it unreasonable for it to want to make sure that it is supplying that information to the correct person. So, asking for proof of identity on each occasion does not seem an unusual request.

It may be the case that if Experian thinks that Mr S is raising the same or similar complaint points to ones in the past, it logs them but does not act on them, If Mr S thinks he has raised new complaint points which Experian has ignored, he can of course go back to Experian.

On the question of how Mr S can access his credit report going forwards, I don't require Experian to send it out each month in the post. It would be for Mr S to request a copy using the details that I have asked Experian to supply to him as part of resolving this complaint. I have also suggested to Mr S that he can try to update his address on his free Experian account. This might then allow him to access his report online. If Mr S has difficulty doing this, he should approach Experian for further help.

Finally, although Mr S says that Experian has admitted to providing inaccurate data from his credit file, Experian says that any lender which searches his file will see the correct data. If Mr S identifies any instances where Experian has supplied incorrect data to a third party, he

can raise this with Experian. This includes any evidence that Mr S may have about how the data has impacted his insurance renewal costs. I don't think it is for me to say what evidence Mr S would need to provide to Experian but I think it would probably have to show that a third party been given the wrong data and that this incorrect data has directly led to a financial loss.

Overall, I still consider that £250 compensation is fair in the circumstances. I appreciate that Mr S may disagree with this.

### **Putting things right**

To put things right, Experian should, if it has not already done so:

- Pay Mr S £250
- Supply details to Mr S explaining how he can obtain a copy of his statutory credit report by post
- Review how Mr S's name appears on the electoral register entries so that the format of Mr S's name matches the one provided by his local council and if necessary, amend the electoral register entries

### **My final decision**

My final decision is that I uphold this complaint. In full and final settlement, I require Experian Limited to put things right in line with my directions above.

Under the rules of the Financial Ombudsman Service, I'm required to ask Mr S to accept or reject my decision before 3 October 2024.

Gemma Bowen  
**Ombudsman**