

The complaint

Mr T complains Equifax Limited have incorrectly linked an address to him on his credit file.

What happened

In March 2023, Mr T says he became aware Equifax had incorrectly linked another person's address to him. And since the other person had not paid a debt, this caused Mr T significant financial loss. Mr T says he has never lived at the address that is being reported on his credit file and that no other Credit Reference Agency (CRA) is reporting this address. Mr T says the only items on his credit report with this address are an entry of an account with "O" and an entry with a debt company "L" from 2021 – Mr T says he believes the account with O was passed to L, but that it's the same account. Mr T says he doesn't have a relationship with O and while Equifax suggested he get in contact with O, Mr T doesn't see this request as reasonable.

Mr T says he raised his concerns about the incorrect address with Equifax but that they continued to report the inaccurate information on his credit file. Mr T doesn't think Equifax are acting in line with the Information Commissioner's Office's (ICO) guidance.

Mr T also said he believes Equifax's authentication procedure is flawed because it doesn't allow him to access his information if it's incorrect. Mr T says as Equifax were reporting the incorrect address on his credit file, he wasn't able to access his account online as he wasn't able to give the 'correct' address since it was one he'd never heard of and was unknown to him. Mr T says Equifax's system sends him round a circular loop and that there is a fundamental flaw in Equifax's sign-up process.

Mr T told us that late 2024, he had a response from O that he wasn't their customer and a copy of his credit file from March 2025 shows the two entries and incorrect address link are no longer being reported

Impact this issue had on Mr T

Overall, Mr T says he estimated the overall loss he suffered to be around £9,400. Mr T has provided a detailed breakdown of how he estimated this amount and while I won't go into the details of the exact items to avoid Mr T being identified in this decision, I'll summarise briefly what he told us.

Mr T says he was intending to re-mortgage his house to afford an extension. Mr T says it appeared in early 2021, Equifax wrongly associated someone else's debt to him. The bank, who he was intending to re-mortgage with, had refused his application and so he had to continue with his existing mortgage which was due to revert to a standard variable rate in 2023. Later on, Mr T found that the bank used Equifax as their CRA.

In February 2023, Mr T says he employed a broker who advised him to check his credit report with all the CRAs. It was at this point, Mr T found Equifax were reporting incorrect information and had shared this with organisations such as the bank he'd tried to remortgage with.

Mr T says as a result, he not only lost out on the opportunity to pay less monthly repayments, he also incurred the cost of engaging a broker, he incurred extra debt which had to be funded at higher interest rates than would otherwise have been the case, as well as the cost of subscribing to services to show his credit report.

Equifax's response to Mr T's complaint

Equifax say they looked into Mr T's concerns and that credit agreement information they hold is given to them by lenders, which they can't change without the lender's permission. In Mr T's case, Equifax say that O owned the information on Mr T's credit file and not Equifax. Equifax say they raised a dispute with O in March 2023 and asked them to investigate Mr T's concerns. In response, O said they didn't deal with fraud enquiries or amendments via Equifax's dispute portal and recommended Mr T contact them by emailing their fraud team who were responsible for removing any accounts, searches or address links from a credit file. So, Equifax didn't uphold Mr T's complaint and reiterated they don't have the authority to remove or amend information and that the linked address would remain on Mr T's credit report.

In relation to issues Mr T faced with trying to log in to his account online, Equifax told us the linked address would not have had any impact on Mr T signing up to view his credit report. They explained the sign-up application would have asked for Mr T's name, date of birth, email address, current address and any address he may have resided in the last six years. Following this, Mr T would have been taken through a verification process. Equifax said if Mr T hadn't resided at the disputed linked address there would be no reason for him to input this as one of the addresses that he resided at.

Our Investigator's view and Mr T's response to this

Our Investigator looked into Mr T's complaint. In summary, he said Equifax disputed the data with O on three occasions, but O didn't give them permission to remove the information from Mr T's credit file. Our Investigator said the incorrect data stemmed from an address link which was created by O and not Equifax. So, while our Investigator sympathised with Mr T, he said he couldn't ask Equifax to remove the address link as this needs to be authorised by O. Our Investigator said Equifax didn't create the link and that the two entries on Mr T's credit file have the same address.

Our Investigator also said while Mr T said he never lived at the address in question, he shared the same first name, surname and date of birth as that on the linked address. Lastly, our Investigator said he would expect that if O were to delete the link they created, this would remove the incorrect address and accounts associated with that address from Mr T's credit file.

Mr T disagreed. In summary, he said:

- Equifax not being responsible for linked addresses where another business provided a link to them is a mockery of the ICO's position – which says the CRA is responsible for linked addresses. Mr T says he repeatedly asked Equifax to respond to this point, but they didn't.
- He wrote to Equifax in late February, early March 2025 to say there were no credit agreements for him at the incorrect address. As a result, Equifax wrote to O and asked them to remove the linked address from Mr T's account. Mr T said because Equifax changed what they said to O, they then got a different response – what Equifax eventually said to O was enough for O to remove the address link and the

incorrect information. And that Equifax ought to have said this to O sooner.

- Equifax ought to have done more with O and that Equifax are responsible for ensuring information being reported is done so accurately.
- He repeatedly asked Equifax to provide him with evidence that O created the link and they ignored this request.
- As O's fraud team never responded to his requests, Equifax should have a way to override O.
- Despite being computer literate, Mr T still can't access Equifax's system as it sends him round a circular loop.
- Mr T asked for an Ombudsman to consider why the ICO believes CRAs are responsible for linked addresses given the ICO's guidance and in instances such as these, what the role of the CRA should be when the data provider chooses not to engage and the data subject, in this case Mr T, has no relationship with the data provider, O.

As Mr T asked for an Ombudsman to consider his complaint, it's been passed to me to decide.

I issued a provisional decision on the matter, setting out the below:

I think it's important to firstly explain I've read and taken into account all of the information provided by both parties, in reaching my decision. I say this as I'm aware I've summarised Mr T's complaint in considerably less detail than he has. If I've not reflected something that's been said it's not because I didn't see it, it's because I didn't deem it relevant to the crux of the complaint. This isn't intended as a discourtesy to either party, but merely to reflect my informal role in deciding what a fair and reasonable outcome is. This also means I don't think it's necessary to get an answer, or provide my own answer, to every question raised unless I think it's relevant to the crux of the complaint. I note Mr T has raised concerns about his interactions with O. But I can't comment on the actions of O, as this complaint is against Equifax, so I can only look at their actions.

I can appreciate how frustrating it must have been for Mr T to have this issue he's described. Especially given what he's told us about the impact it has had on him. But I need to make it clear I can only uphold this complaint against Equifax if I'm satisfied they've done something wrong.

Equifax's explanation of linked addresses

Having reviewed Equifax's website about linked addresses, it says these are addresses that a customer or any of their financial associates have lived where credit has been taken out or applied for. And that links between addresses are created when a customer provides a company with their current and previous addresses during an application.

Equifax's website then goes on to say if there is a linked address appearing on a customer's credit report and as long as there's no information for them at that address, Equifax should be able to remove it.

The ICO's explanation of who is responsible for information, such as linked addresses, appearing on a credit file

The ICO's guidance explains:

"It is easy to see why people assume the CRAs are responsible for all the information that appears on their credit file. However, in reality, the lenders and telecoms and utility companies who passed the information to the CRA in the first place also have responsibilities for the information that appears on your credit file.

As a general rule, if the entry you are looking at has the name of a company on it, it's likely to be that company who is responsible for that entry. The CRAs cannot amend this data without the permission of that company.

Having said this, we still expect the CRAs to take reasonable measures to ensure the information that is reported by lenders via their credit files is accurate.

The information that is generated by the CRAs and for which they are responsible, includes financial links, linked addresses and alias information."

In relation to linked addresses, the ICO's guidance says:

"Address links are typically created by the CRAs from the information given by individuals in credit agreements. However, errors can occur when information is provided inaccurately or when a 'mis-trace' has occurred... A 'mis-trace' occurs when an organisation is searching for an individual but mistakenly traces someone with the same or similar name."

It also says "Being linked to a debt that is not yours is not acceptable. You should contact the CRA you got your report from to tell them about this error. Each time a linked address is created, the CRA records the source of this link so they should be able to see exactly when and why this address link was created and 'break' any inaccurate links."

The address link issue and Equifax's handling of the dispute

It seems from the information provided that this issue came about as a result of the entry on Mr T's credit file from O and then L for the linked address having the same first name, surname and date of birth as Mr T.

With this in mind, I've gone on to consider how exactly the incorrect address came to appear on Mr T's credit file. While I acknowledge the ICO guidance mentions that CRAs, like Equifax, are responsible for linked addresses, it does also mention each time a linked address is created the CRA records the source of this link. I've had a look at the entries on Mr T's credit file and I think it's more likely than not that the reporting of this account by O generated the address link. I'm not persuaded Equifax were responsible for the incorrect address link as I don't think they were the source of this link – I think the source was O.

The ICO guidance refers to the expectations of CRAs taking reasonable measures to ensure information being reported on a customer's credit file is accurate. The guidance doesn't define what reasonable measures are, but I've thought about Equifax's actions and whether they did enough in the way they handled Mr T's dispute about the address link. As per Equifax's website, because they don't own the data on a credit file, if information is incorrect they'll raise a dispute with the data supplier on behalf of a customer – which I think is Equifax setting out their responsibility in scenarios like this.

I've looked through Equifax's internal notes and can see they contacted O in March 2023 about the linked address. O responded and advised Mr T to contact their fraud team directly – this was relayed back to Mr T. As Mr T remained unhappy with this, a further dispute was raised with O in June 2023 and again, O responded to say Mr T would need to contact their fraud team. Having considered Equifax's actions here, I don't think Equifax were being unhelpful when referring Mr T to O's fraud team as this is what O told them to tell Mr T.

Additionally, the ICO guidance refers to if there's inaccurate information on a credit file, the problem may lie with the organisation that supplied the CRA with the information, so the customer would need to contact them instead. In context, this seems reasonable as O would be the only party who have all the account details and would be able to determine if the account has potentially been opened fraudulently using Mr T's details - I don't think it's appropriate or even possible for a CRA to decide whether an account with another company is fraudulent.

Equifax responded to O in July 2023 along with Mr T's comments to the previous disputes, which resulted in O responding with the same answer as the previous two disputes. In the two disputes that were raised, Equifax told O Mr T wanted the linked address removed as he never lived at that address and didn't recognise it at all.

Overall, Equifax raised disputes with O on more than one occasion about Mr T's concerns. Mr T also acknowledged he didn't think Equifax done anything wrong here. But Mr T said he doesn't think engaging with O was the limit of Equifax's responsibility and questioned why Equifax needed O's permission to remove the link. As explained, I think the incorrect address link came about as a result of O reporting an account at the incorrect address on Mr T's credit file. Therefore, as Equifax weren't the owners of this information, they wouldn't have been able to remove it without the data owner's permission.

Mr T told us that in late 2024, he had a response from O that he wasn't their customer and Equifax's internal notes show they raised further disputes about the incorrect address from February 2025 to March 2025. In response to Equifax's final dispute in March 2025, O said "Please remove the linked address from customer's account." I can understand why Mr T may consider this as evidence that Equifax should have removed the address earlier, but until O provided this information, Equifax had no justification to do so.

Equifax provided a copy of Mr T's credit file from March 2025, and I can see the entries from O and L are no longer appearing his credit file and neither is the incorrect linked address. I think this further evidences that Equifax weren't responsible for the linked address appearing on Mr T's credit file as O provided authority for the linked address to be removed and then it was. I appreciate Mr T says Equifax should have had a way to override O. But based on my explanation above, Equifax didn't own the data, instead, I'm persuaded O did. So, Equifax wouldn't have been able to remove the data without O saying they should.

Mr T questioned what Equifax said differently to O for the address link to be removed compared to previous disputes they raised. However, from the evidence I've seen, it appears Equifax told O the same thing in the disputes they raised – that it wasn't an address Mr T lived at nor recognised. So, I can't say what made O eventually decide for the removal of the linked address from Mr T's credit file. And that wouldn't be a question I'd expect Equifax to be able to answer – because it was O's decision.

I note Mr T says if Equifax had a reason to believe he was linked to the incorrect address, they should have provided evidence of this when he asked for it. However, I don't know what Equifax would have been able to provide Mr T with as I think it was more likely than not that the address link was created because of O reporting the incorrect account on Mr T's credit file. I appreciate this situation was frustrating for Mr T, but I can't say why O eventually made the decision for the linked address to be removed.

Mr T has commented on other CRAs which didn't report the linked address. However, as per the ICO's guidance, not all three CRAs will report the same information as there is no requirement under data protection law for lenders to report such data to all the CRAs and it is up to the lender to decide which CRA they wish to use, if any. While I can't say for certain that is what happened here, it's also not my role to comment on why the other CRAs weren't

reporting the linked address as I can only decide whether Equifax have acted fairly in the circumstances.

Address link issue preventing Mr T from logging into his account with Equifax online
Mr T said it was this association with a different address that had prevented him from logging on to Equifax online in the past. Mr T says Equifax operate a verification scheme when signing up where he had to determine which information was “correct”. And as they had the wrongly linked address, he wasn’t able to provide Equifax with the address they deemed as “correct” until he discovered what the incorrect address was through checking his credit file. Mr T described this process as one that sends him round the same loop, without being able to access his account successfully.

While I appreciate Mr T’s comments, Equifax have provided screenshot evidence to show Mr T created an account with them in March 2023 and last accessed it in March 2025. I should also explain that this Service is not the regulator, that’s the role of the FCA. So, if Mr T hasn’t been able to access his account based on the information he provided Equifax with and also his thoughts that Equifax’s verification scheme is flawed, even if I found that Equifax had acted unfairly here, I wouldn’t be able to instruct them to change their verification processes as a result. It’s their commercial judgement as to the level of security they choose to apply to their sign-up process.

Mr T also commented on issues he faced when trying to raise a data subject access request (DSAR) – he said Equifax’s software sent him round in a loop and that their online system failed to provide him with a DSAR. If Mr T’s having issues with this and how Equifax’s systems operate in relation to a DSAR, I’d suggest he raise this with the ICO.

Responses to my provisional decision

Equifax responded to my provisional decision and said they didn’t have anything to add.

Mr T responded and asked to see a copy of Equifax’s internal notes that I referred to in my decision. So, I asked the Investigator to share a redacted version of Equifax’s internal notes with Mr T. Mr T raised the following points in response to my decision – I’ve summarised what I consider to be the key points using my own words:

- He wasn’t a customer of O and that he shouldn’t be treated as one – Mr T says there was no explanation for why O and L said he wasn’t their customer, yet Equifax referred to him as their customer, which was misleading,
- Mr T also said he never received a response when he contacted O on the email address Equifax passed to him and said at no point did Equifax take this up with O or ever challenge O’s answers,
- Mr T referred to another country’s courts’ interpretation of The General Data Protection Regulation (GDPR) in relation to one of their CRAs and said consideration ought to be given to the effects of the court case,
- My decision is at odds with what the ICO says about linked addresses and Equifax’s responsibility in relation to this, as a CRA,
- Mr T also questioned Equifax’s responsibility in the disputes process and whether them passing information to O is showing sufficient responsibility – Mr T says this interpretation is at odds with a common understanding of the word ‘responsible’. Mr T says Equifax should have control or authority and that they should be able to make rational decisions without supervision,
- Mr T says there’s been confusion between the linked address and the debt with O – Mr T said the inaccurate information is not the debt, it’s the association of the debt

and that he was linked to the customer and to the data subject through the address link,

- Mr T made a request to Equifax for proof that O asked them to link the incorrect address, to his address. But this proof was never received, which would have provided leverage in contacting O,
- The dispute Equifax raised with O in March 2025 (that eventually led to O asking Equifax to remove the linked address) was the first time Equifax asked O about the linked address.

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.

While I may not address every point Mr T has raised, I have taken them all into consideration and thought carefully about what Mr T has said when reaching my decision.

Mr T referred me to a court case from another country and their interpretation of GDPR. But my role is to decide this complaint fairly and reasonably, based on what's relevant here – so I can't take foreign law into account.

I've noted Mr T has pointed out that he didn't say what I said he said in my provisional decision. For reference, I said *"He wrote to Equifax in late February, early March 2025 to say there were no credit agreements for him at the incorrect address...Mr T said because Equifax changed what they said to O, they then got a different response..."* it's not entirely clear to me which part of what I wrote Mr T says he didn't say. But for clarity, I took the first part of my paragraph from the email Mr T sent to Equifax on 4 March 2025 where he said *"As the credit agreements at the address of [linked address street name] are in the name of another person (as confirmed by both L and O to me that they are nothing to do with me) then there are no credit agreements for myself at the [linked address] and there never were"* and I took the second part where I referenced what Equifax said eventually to O from Mr T's email to our Investigator of 25 April 2025, where he said *"...when Equifax changed the question that they asked of O, they got a different response..."* Though I'm sorry Mr T thought I'd misinterpreted what he said.

Mr T questioned Equifax's responsibility and said they should have control or authority and they should be able to take rational decisions without supervision. The ICO doesn't define what reasonable measures for CRAs look like, so I looked at Equifax's own process for raising a dispute about incorrect information on a credit file. Their website explains they're responsible for handling disputes about linked addresses fairly and promptly. This means checking with the organisation that supplied the information, updating or removing it. But Equifax can't alter or remove information a lender or other data provider confirms as accurate. I think Equifax are limited to making sure the information they hold is correctly recorded through raising disputes, but the underlying accuracy remains the responsibility of the organisation that supplied it. With all things considered, I think Equifax followed that process here, which I think was fair.

Mr T also said he wasn't O's customer and that throughout Equifax's messages to O, Equifax referred to him as the customer. While I understand Mr T's concerns that he wasn't O's customer, I don't think Equifax acted unfairly in referring to him as 'the customer' to O, as he was a customer of Equifax's. And, until O confirmed otherwise, it was reasonable for Equifax to believe he could have been a customer of O.

I can understand Mr T's frustrations as he wasn't getting a response from O using the email address for them that Equifax sent to him. However, I don't think this is Equifax's fault.

Equifax were simply passing on the information O had provided to them – which was the email address for Mr T to contact O on. I don't hold Equifax responsible for the fact that O weren't engaging with Mr T as they're a separate business to O. I don't think Equifax's role extends to challenging what they are being told by data providers – that's not how they explain they'll manage disputes. I can understand why Mr T says Equifax should have conducted a more thorough investigation into this issue than they did. However, this isn't what Equifax say they'll do when managing a dispute about information on a credit file – nor do I think it'd be practical for them to do, on the basis they'd hold so little information about the account in dispute.

When Mr T saw a copy of Equifax's internal notes, he said the dispute they raised in March 2025 with O was the first time he saw Equifax asking O about the linked address. While I acknowledge the dispute Equifax raised with O in March 2025 included the specific address details that were in dispute, the earlier disputes made clear Mr T was challenging the link as he'd never lived there. While Equifax could have worded things differently, I'm satisfied they provided O with enough information from the earlier disputes to be able to investigate the issue.

Mr T says there's been no clear explanation that O don't provide the same information to all CRAs and that he's seen elsewhere that they reportedly do. I'm not deciding on O's actions here - this complaint is about whether Equifax acted fairly in the circumstances. As the ICO's guidance explains, not all three CRAs will report the same information and it's up to each lender to decide which CRA they use. I'm not deciding whether O did or didn't report the same information to all the CRAs.

Having reviewed Equifax's internal notes again, I can see there were times when Mr T asked Equifax certain questions but didn't receive a direct answer from Equifax – such as the proof Mr T asked for from Equifax and also evidence of why Equifax believed the account with O to be fraudulent – although it seems from Equifax's notes that O were the party who suggested the account could be fraudulent. While I can see instances where Equifax did respond to some of Mr T's questions, I acknowledge that at times Equifax could have done better to respond to other queries. That said though, I think some of the questions Mr T raised with Equifax were matters for O. And while I acknowledge Mr T says he never received a response from O's fraud team, as before I can't fairly hold Equifax responsible for this.

Mr T also felt my decision was at odds with the ICO's guidance. The guidance explains that each time a linked address is created, the CRA records the source of this link. I think it's more likely than not that the reporting of the account by O generated the address link. This is supported by the fact O later gave authority to Equifax for the link to be removed – something I don't think would have happened if O weren't the source. And I don't think Equifax would have been able to remove the linked address information without O's authority to do so.

Mr T said the ICO's guidance says that the 'CRA....should be able to....break any inaccurate links.' And I agree, in summary, it does say this. However, Equifax weren't given any information by the source of the link (in this case O), to say the information was inaccurate. Without this, I don't think they would have been able to break the link. As I've said before, once O told Equifax to remove the linked address from Mr T's account, this was then done. Mr T reiterated he had difficulty viewing his credit report because logging into his account required previous addresses, from the last six years, to be disclosed – and he was linked to the incorrect address which he knew nothing about. Equifax provided screenshot evidence to show Mr T created an account with them in March 2023 and last accessed it in March 2025. In any case, as we're not the regulator, even if I did find Equifax's verification scheme to be unfair, I wouldn't be able to instruct Equifax to do anything different here.

Mr T also reiterated requesting a DSAR sent him round in circles on Equifax's system where despite going through certain steps on Equifax's website, he's then taken back to their DSAR landing page where he's asked to register or log in. As explained in my provisional decision, if Mr T's having issues with this and how Equifax's systems operate in relation to a DSAR, my suggestion remains that he raise this with the ICO.

My final decision

For reasons explained above, I don't uphold this complaint.

Under the rules of the Financial Ombudsman Service, I'm required to ask Mr T to accept or reject my decision before 24 September 2025.

Leanne McEvoy
Ombudsman