

[REDACTED]

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**From:**

**Sent:**

[REDACTED]  
13 February 2020 16:30

**To:**

SARguidance

**Cc:**

**Subject:**

[REDACTED]  
Consultation on draft revised Subject Access Request Guidance

External: This email originated outside the ICO.

To whom it may concern,

I appreciate that the SAR guidance consultation officially closed yesterday but I hope that you will still be able to take into consideration a brief standalone comment about one aspect of the draft revised Subject Access Request Guidance.

Our concern is about the issue of asking a requestor to provide additional details following a request being made, with regard to the section entitled 'Can we clarify the request?' notably the paragraph at the top of page 24 and in particular the part of the sentence that states that "[t]he time limit is not paused whilst you wait for a response."

In our view, based on our experience over a number of years now dealing with SARs, the time for responding to an SAR should keep running when there are outstanding questions with a requestor. In our experience, some individuals, and in particular some commercial entities who are now making a business out of handling data subject requests, fail to provide the relevant information when they make a request and seem to want to simply start the clock running. If the ICO were to maintain its position in the final version of the revised guidance that the time-limit is not paused we feel that the system would be open to abuse.

Thanking you in advance for considering this concern.

Kind regards,

[REDACTED]  
.....

[REDACTED]

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