

Start of new case

Q1 Does the draft guidance cover the relevant issues about the right of access?

☐ Yes

☒ No

☐ Unsure / don't know

If no or unsure/don't know, what other issues would you like to be covered in it?

Data subjects can issue SARs simply to be malicious resulting in huge cost to the organisation due to the time and effort required to process these requests. Also, data subjects can request info that has already been provided to them - they can then request this info again - these requests cost the organisation money to process. The SAR process should allow companies to charge to process SARs where the data subject has been sent the information previously. For example employment documentation [contracts, time-sheets, payslips....] - where the employee has been sent this info the company should be allowed to charge for this or reject the response. Also, where a company reasonable suspects that a request is purely malicious - designed to cause harm to the company the company should be able to reject the request or charge a fee. Where the data subject simply requests all the data a company holds about them the company should be allowed to request further information to reduce the effort required. There is an imbalance between the data subject that can simply say 'send me everything' which takes a few seconds and costs them nothing - and then the response from the company that can take many hours and involve huge costs. This imbalance leads to malicious requests.... Regulations should allow a company to reject malicious SARs designed to extract compensation - data subjects are increasingly aware that sending a SAR to a company will result in significant time and effort for the company. There

Q2 Does the draft guidance contain the right level of detail?

☐ Yes

☒ No

☐ Unsure / don't know

If no or unsure/don't know, in what areas should there be more detail within the draft guidance?

see above

Q3 Does the draft guidance contain enough examples?

☐ Yes

☒ No

☐ Unsure / don't know

If no or unsure/don't know, please provide any examples that think should be included in the draft guidance.

see above

Q4 We have found that data protection professionals often struggle with applying and defining 'manifestly unfounded or excessive' subject access requests. We would like to include a wide range of examples from a variety of sectors to help you. Please provide some examples of manifestly unfounded and excessive requests below (if applicable).

see prev

Q5 On a scale of 1-5 how useful is the draft guidance?

1 - Not at all useful	2 – Slightly useful	3 – Moderately useful	4 – Very useful	5 – Extremely useful
<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Q6 Why have you given this score?
doesn't reflect real life situations.

Q7 To what extent do you agree that the draft guidance is clear and easy to understand?

Strongly disagree	Disagree	Neither agree nor disagree	Agree	Strongly agree
<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Q8 Please provide any further comments or suggestions you may have about the draft guidance.

lacks detail

- Q9 Are you answering as:
- ☐ An individual acting in a private capacity (eg someone providing their views as a member of the public)
 - ☒ An individual acting in a professional capacity
 - ☐ On behalf of an organisation
 - ☐ Other
- Please specify the name of your organisation:
- optindigo

- Q10 How did you find out about this survey?
- ☐ ICO Twitter account
 - ☐ ICO Facebook account
 - ☐ ICO LinkedIn account
 - ☐ ICO website
 - ☒ ICO newsletter
 - ☐ ICO staff member
 - ☐ Colleague
 - ☐ Personal/work Twitter account
 - ☐ Personal/work Facebook account
 - ☐ Personal/work LinkedIn account
 - ☐ Other

Thank you for taking the time to complete the survey