

ID.	Date of interview
date	04/02/20
ID.	Time interview started
start	13:00:00
ID.end	Completion date of interview
Date	04/02/20
ID.end	Time interview ended
	13:37:29
ID.	Duration of interview
time	37.48

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Q1 Does the draft guidance cover the relevant issues about the right of access?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

Q2 Does the draft guidance contain the right level of detail?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If no or unsure/don't know, in what areas should there be more detail within the draft guidance?

It would be helpful to have more examples of documents to provide, e.g. 1. Emails - If an email is sent to all employees with a list of open jobs the data subjects email address would be included in the list of 'To's' this email is sent on a weekly basis - would we need to provide 52 copies of this. 2. WhatsApp messages - what would be considered 'reasonable' to provide these if they are on corporate devices. 3. If an employee has been with a company for 25 years, imagine the number of emails sent - if the data subject requested 'All Data' how would this be carried out.

Q3 Does the draft guidance contain enough examples?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If no or unsure/don't know, please provide any examples that think should be included in the draft guidance.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 my answer to Q2. 1. Weekly reports - that contain the data subjects name, for example Mileage - would we need to provide 52 copies of the report - or could we cover it by saying 'your name appears in xxx report' 2. Emails sent to 'everyone' announcing a colleagues birthday: cakes are available on xx desk - would we need to include these. 3. If a data subject requests 'All Data' what would be considered a reasonable search if we don't have automatic tools within outlook to look for names. Would asking the line manager and team members + HR, specific departments be sufficient?

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).

'All Data' when an employee has worked for a company for 5+ years. Systems have changed. Multiple managers, they have worked on multiple projects etc. Specifically on emails. Where an email chain is 20 emails long, do we need to provide all 20 or just the latest. How can we be sure its the latest. The reality is that when we ask manager to provide emails we get the same email so many times, the only way to manage this is to create a folder for each manager to put their emails in, we then allocate a folder for redaction, the same email could be in multiple folders but as different people are doing the redaction they don't see the duplication. This is taking so much time and also not the ideal for the data subject as they receive so many copies. We do not have the budget for clever software so are doing this manually. The time frame is also difficult - if a manager requested to provide data is away on holiday for 2 wks for example, we immediately loose 2 weeks if that person has lots of data to provide then the redaction can take a long time depending on the content.

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 type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Q6 Why have you given this score?

Because it doesn't go far enough on specific examples. Guidance on how to redact, what tools can be used, how to redact. What to consider. How to search for personal data in an email, is the fact that the email is sent to the data subject but the content of the email is regarding a business matter, e.g. arranging for a customer visit. would this email still be considered personal data, even if the data subject has already seen it.

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 type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

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

The document is clear but doesn't give enough examples or operational guidance.

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:

Schneider Electric

What sector are you from:

Energy Efficiency

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

If other please specify: