

ID. Date of interview
date 06/01/20

ID. Time interview started
start 13:19:56

ID.end Completion date of interview
Date 06/01/20

ID.end Time interview ended
16:36:34

ID. Duration of interview
time 196.63

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Q1 Does the draft guidance cover the relevant issues about the right of access?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Q2 Does the draft guidance contain the right level of detail?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If no or unsure/don't know, in what areas should there be more detail within the draft guidance?

Q3 Does the draft guidance contain enough examples?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If no or unsure/don't know, please provide any examples that think should be included in the draft guidance.

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).

As a DPO I have received SARs where the requestee has clearly indicated that they intend to, or have already, commenced litigation. It would be good to see an example of this. Additionally, I have had a SAR that requested a copy of a voice recording from a general help-line that my company operates. After consultation with yourselves, I decided that the voice recording did not fall within the scope of a SAR as the said recording did not contain any personal data but merely the sound of the requestee's voice. I'm sure that there are many other organisations that have generalised help-lines that record sessions.

Q5 On a scale of 1-5 how useful is the draft guidance?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 type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Q6 Why have you given this score?

As a privacy professional I have often struggled to uphold the privacy rights of the individual at the same time balancing this with the protection of the legitimate interests of the company. This guidance is extremely useful in reducing the "grey" boundaries of the DP law.

Q7 To what extent do you agree that the draft guidance is clear and easy to understand?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 type="radio"/>	<input checked="" type="radio"/>

Q8 Please provide any further comments or suggestions you may have about the draft guidance.

Well drafted in clear non-legalese.

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:

VFS global

What sector are you from:

government outsourcing

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: