

9 August 2024

IC-324351-X2B7

Request

You asked us:

Pleaser can you provide me with a copy of the current list of DPO - Data Protection Officers, as I am unable to open the zip file downloaded. In addition, Please confirm who the Data Controller is for the (attached) and the below: Romulus Holdings Group Romulus Holdings Limited Romulus Construction Limited Is there a named person, responsible for the processing of privacy SAR requests. Could you also please confirm who is the appointed contact for this Group of companies from a Data Protection Perspective?

We received your request on 2 August 2024.

We have handled your request under the Freedom of Information Act 2000 (the FOIA).

Our response

We do hold information within the scope of your request.

You have asked for our list of current registered Data Protection Officers, this list is available on our website [here](#). We appreciate that you say that you are unable to open the file but we have checked and there are no problems with the file which would mean that it could not be accessed.

As it is available on our website to download in csv format, this information is reasonably accessible to you, and therefore exempt from disclosure under s.21 FOIA. We would be unable to send this to you in a format other than a zip file due to size in any case.

If you are still having problems downloading the file, you can also search the register for DPO details [here](#).

With regards to Romulus Holdings Group, their entry on the register including contact details is available to view [here](#). We do hold the name of their registered DPO, but they have chosen not to include this on the public register, and we are not able to disclose it as it is personal data and exempt under s.40(2) FOIA. We would suggest that you use the details included on the register for making contact with this Company. We note that their privacy notice also includes the following email address for contacting their DPO: dataprotection@romulusuk.com.

FOIA section 40(2)

As explained above we have withheld the name of Romulus Holdings Group's DPO. Section 40(2) of the FOIA exempts information if it is personal data belonging to an individual other than the requester and it satisfies one of the conditions listed in the legislation.

We find that the condition at section 40(3A)(a) applies in this instance: that disclosure would breach one of the data protection principles. The principles are outlined in the General Data Protection Regulation (GDPR) with the relevant principle on this occasion being the first principle as provided by Article 5(1): that personal data shall be processed lawfully, fairly and in a transparent manner.

We do not consider that disclosing this information into the public domain is necessary or justified. There is no strong legitimate interest that would override the prejudice to the rights and freedoms of the relevant data subjects. We have therefore taken the decision that disclosing this information would be unlawful, triggering the exemption at section 40(2) of the FOIA.

This concludes our response.

Next steps

You can ask us to review our response. Please let us know in writing if you want us to carry out a review. Please do so within 40 working days.

You can read a copy of our full [review procedure](#) on our website.

If we perform a review but you are still dissatisfied, you can complain to the ICO as regulator of the FOIA. This complaint will be handled just like a complaint made to the ICO about any other public authority.

You can [raise a complaint](#) through our website.

Your information

Our [privacy notice](#) explains what we do with the personal data you provide to us, and sets out [your rights](#). Our [Retention and Disposal Policy](#) details how long we keep information.

Yours sincerely



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**For information about what we do with personal data
see our [privacy notice](#)**