

17 April 2025

IC-374264-S1D2

Request

"Paragraph 27 of Data Protection Fining Guidance states that a parent company can rebut the assumption that it exercises decisive control over a subsidiary where the parent holds all voting shares. It states that the parent company must provide sufficient evidence of independence of the subsidiary.

What recorded information do you hold on:

- * the types of evidence for consideration
- * guidance for caseworkers to assess if the evidence provided is sufficient to make this case with specific reference to processing of personal data"

We received your request on 2 April 2025.

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

Our response

The paragraph you refer to is 30, rather than 27.

We hold some information in scope of your request.

Two relevant cases have been included in a [footnote](#). This information is withheld under section 21 of the FOIA because it is already available to you.

There is no other information held.

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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