

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Q1 Does the draft guidance cover the relevant issues about the right of access?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Q2 Does the draft guidance contain the right level of detail?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If no or unsure/don't know, in what areas should there be more detail within the draft guidance?

I don't think it is clear in the case with emails what information should be provided and the manner in which it should be provided. IE, do you just provide the personal information contained within the email, or the whole redacted text with the recipient's personal information removed; and how can this be provided in a portable format - presumably a paper printout or a Word document isn't sufficient - in which case transcribing email content into a csv document risks an infringement of privacy due to the human intervention in this process and the availability of the content of the email to the transcriber.

Q3 Does the draft guidance contain enough examples?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If no or unsure/don't know, please provide any examples that think should be included in the draft guidance.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

We see several requests originating from territories outside the EU where the requestor is neither resident in the EU or an EU citizen, but mistakenly believe that GDPR is a global corporate requirement. For example, as US citizen living in the US requesting a SAR.

Q5 On a scale of 1-5 how useful is the draft guidance?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

Q6 Why have you given this score?

It clarifies some points, but the guidance that's really needed is how, ie to extract data from backed-up archives or email, rather than unhelpfully telling us that the law applies, but it's going to be difficult. It also seem to miss out the legal requirements to obtain data from third party providers and their archives, which can account for a significant delay.

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.

This draft should be aimed at small businesses and large corporations alike. It presumes a corporate level of IT capability and does not provide suggestions for smaller companies to approach the issues. It states early on that the size of company should be taken into account when responding, but it provides no framework for this.

- 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:

I don't feel comfortable providing this. I am responsible for Project Managing GDPR in our company.

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