

ID. Date of interview
date 30/01/20

ID. Time interview started
start 12:10:33

ID.end Completion date of interview
Date 30/01/20

ID.end Time interview ended
14:23:35

ID. Duration of interview
time 133.03

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Q1 Does the draft guidance cover the relevant issues about the right of access?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Q2 Does the draft guidance contain the right level of detail?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If no or unsure/don't know, in what areas should there be more detail within the draft guidance?

Q3 Does the draft guidance contain enough examples?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If no or unsure/don't know, please provide any examples that think should be included in the draft guidance.

More examples are always helpful. I really like the examples that have been given but think more would be good. Perhaps some further examples around third party requests e.g. financial advisors or other advisors when it is clearly a "fishing expedition"

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 have had situations where claims management companies are selling their "service" to others i.e. a platform that spits out 100s of DSARs to multiple providers - with no justifiable basis on why those providers are targeted. For example they sell this service to Solicitors that has been appointed by the Court of Protection for mental incapacity. Whilst we appreciate that the guidance does make mention of the Solicitors acting in this capacity as being legitimate - I do not think they are aware that their own personal data eg copies of passport and address are being circulated to over 100 organisations (as per the guidance we have contacted them to inform them of our concerns). Having vulnerable people's personal details blanket sent to multiple companies with no encryption or password protection on the off chance we may have some information on them is surely unfounded? After contacting them a lot of them admit that they do not believe we would have any personal data on the individuals concerned. As we are data processors for pension schemes not providing us with the data controller's name is also an issue (if we do hold data) because we cannot obtain consent to release the personal data without passing them to the data

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?

as per response to Q4 - the guidance is helping in confirming we have been taking the correct actions however we feel it could go further in some scenarios.

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.

Perhaps an example of when personal data stored on someones own device counts as in scope or not eg whatsapp work group on a personal phone?

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:

lane clark and peacock

What sector are you from:

professional advisors/financial services/pensions

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: