

20 February 2025

FOI Ref 17704

Request - You asked us the following:

1. Can I have your records about sales of personal data from 2023 (01.01.2023) to 2024 (31.12.2024), including trading partners and money earned from transactions?
2. Do you use tracking cookies on your website, and can I have a list of third parties that you share personal data with?
3. Have you received any complaints about how you handle personal data? This includes collecting, storing, sharing or selling, as well as wider processing practices. Please can I view records about these complaints for 2023 and 2024?
4. How many subject access requests did you receive in the period 2023-2024, broken down by year? What types of personal data did they typically receive? For example email addresses, home addresses and telephone numbers?
5. How many data breaches have you experienced for the past 5 years (broken down by each year)?

Clarification received 03/02/2025:

Can you confirm how many complaints you have received about collecting, storing, sharing or selling, as well as wider processing practices around how you handle personal data during 2023 and 2024.

We received your request on 22/01/2025 and have processed this under the Freedom of Information Act (FOIA).

Staffordshire Police's response to your enquiry is as follows:

In accordance with Section 17(1) of the Freedom of Information Act, this letter represents a refusal notice for this particular request.

The following exemption has been applied:

- Section 12(1) where the cost of compliance exceeds the appropriate limit.
- Section 12(1) does not oblige a public authority to comply with a request for information if the authority estimates that the cost of complying with the request would exceed the prescribed limit'.

The above information has been withheld for the following reasons:

There is no method by which we can readily retrieve information from our systems to answer this request. For question 4, during the time period requested, there have been in excess of 1,200 subject access requests received by the force. In order to determine the type of personal data each individual applicant received, the record for each subject access log would require manual reviewing.

From dip sampling, it has been estimated that it would take approximately 5 minutes to review each log to answer this request and would equate to upwards of 100 hours. To achieve this task would therefore exceed the 18-hour time and cost threshold of the Freedom of Information Act by some considerable margin.

Advice and assistance

Section 16 of the Act places an obligation upon the Authority to provide advice and assistance, in order to comply with this obligation please see below.

If the request was amended to remove the requirement for the types of personal data received, Staffordshire Police would be able to provide a response to the remaining questions, if held. However; please note that further exemptions may apply.

Please be advised that all Freedom of Information request responses are published on the Staffordshire Police website although personal details are not included.

Freedom of Information Request Appeals Procedure

1. Who Can Ask for a Review

Any person who has requested information from Staffordshire Police, which has been dealt with under the Freedom of Information Act, is entitled to complain and request an internal review, if they are dissatisfied with the response they received.

2. How to Request a Review

Requests for review of a Freedom of Information request must be made in writing within two months of the date of receipt of this email, and should be addressed to:

foi@staffordshire.police.uk

Or by Post to:

Central Disclosure Unit
Staffordshire Police HQ
PO Box 3167
Stafford
ST16 9JZ

The reference number, date of the request and details of why the review is being requested must be included. Requests for review should be brought to the attention of the Central Disclosure Unit within two months of the Force's response to the original FOI request.

3. Review Procedure

Receipt of a request for review will be acknowledged in writing. The review will be conducted by another Decision Maker who is independent from the original Decision Maker. The Central Disclosure Unit will set a target date for a response. The response will be made as soon as is practicable with the intention to complete the review within 20 working days. In more complex cases the review may take up to 40 working days.

The independent Decision Maker will conduct a review of the handling of the request for information and of decisions taken, including decisions taken about where the public interest lies in respect of exempt



STAFFORDSHIRE
POLICE

information where applicable. The review enables a re-evaluation of the case, taking into account the matters raised by the complaint.

4. Conclusion of the Appeal

On completion of the review the Independent Decision maker will reply to the complainant with the result of the review. If the complainant is still dissatisfied following the review they should contact the Information Commissioner to make an appeal. The Information Commissioner can be contacted via the following details:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

ICO Website for complaints link: <https://ico.org.uk/make-a-complaint/foi-and-eir-complaints/foi-and-eir-complaints/>

Freedom of Information
Central Disclosure Unit