



Response Date:30/03/2021

2021/233 - Personal Data

In response to your recent request for information, excess cost is relevant to parts which removes the forces obligations under the Freedom of Information Act, as a gesture of goodwill, I have supplied information, relative to your request, retrieved or available before it was realised that the fees limit would be exceeded. I trust this is helpful, but it does not affect our legal right to rely on the fees regulations for the remainder of your request.

Can I have your records pertaining to sales of personal data from 2019 (01.01.2019) to 2020 (31.12.2020), including trading partners and money earned from transactions?

We do not sell Personal data.

Do you use tracking cookies on your website,

This is managed by the national Single Online Home (SOH) development team but all details can be found here:

<https://www.northwales.police.uk/hyg/cookies/>

Can I have a list of third parties that you share personal data with?

Our information is set up and searchable for our policing purposes. We do not hold a definitive list of all third parties that we share personal data with. To obtain the information in the format you have requested would involve contacting all departments and reviewed each record on our force system. The cost of providing you with the information is above the amount to which we are legally required to respond i.e. the cost of retrieving the information exceeds the 'appropriate level' as stated in the Freedom of Information (FOI) Fees and Appropriate Limit regulations 2004.

Therefore, in accordance with the FOI Act 2000 the information you have requested is exempt under Section 12 (1), and this letter acts as a Refusal Notice under section 17 (5) of the legislation.

Our privacy notice may be of interest to you;

<https://www.northwales.police.uk/hyg/fpnnorthwales/privacy-notice/>

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 pertaining to these complaints for the years 2019 and 2020?

Professional Standards Department (PSD) complaints

2019 complaints (x1)

1. Complainant states that their complaints relate to potential police disclosure of her personal data from January 2018 onwards and there was a failure to safeguard her by releasing sensitive personal data to third parties.

2020 complaints (x5)

1. On ... October 2019 ... was responsible for a potential breach of data as they supplied personal details regarding ... to a Human Resources manager employed by ...
2. In December 2019 the complainant received correspondence from North Wales Police (NWP) addressed to his home address in the name of ..., which contained personal information including a summons. Thereafter NWP sent a further letter to his address containing details of conviction and fines imposed. The complainant feels that this correspondence has divulged sensitive personal data to him due to errors at NWP
3. Complaint about how the attending police officer handled the incident. Also about a possible personal data breach by one of the officers attending.
4. The complainant alleges that on ... May 2020 ... unlawfully disclosed personal data to her employers.
5. The complainant alleges that as a result of a Subject Access Request made by him to Victim Support he has been made aware of email correspondence that has been unlawfully withheld and furthermore alleges that the officers have been unlawfully processing his "Sensitive Personal Data" in contravention of the new GDPR Rules.

Information Commissioner Complaints

2019	Not received a satisfactory response from the Police regarding his subject access request, not provided all data and withheld certain data
2019	Inappropriate disclosure to Partner organisations
2019	... concerned that NWP has not provided him with access to all of the information to which he is entitled in response to his subject access request
2019	... concerned that NWP has not provided the information asked for in its response to his subject access request]. ...
2019	Various concerns surrounding, inappropriate obtaining of her personal data, excessive disclosure, refusal to erase her personal data and NWP failure to report a data breach
2019	Complaint regarding a breach of personal data by a PC who contacted the individuals GP surgery.
2019	Concerns regarding the inappropriate disclosure of a mental health warning marker.
2019	... concern regarding the Police and the disclosure of his personal data. ... concerned that the Police sent a copy of his requisition to incorrect address
2020	... handling of accuracy concerns he has raised. ... where the dispute regards an opinion. ... shared inaccurate information ... may not have provided him with all data to which he is entitled in response to a subject access request ('SAR'). ...
2020	Complaint regarding rectification response
2020	... disclosed only some of the information he requested; ...

How many Subject access requests did you receive in the period 2019-2020, broken down by year? What types of personal data did they typically receive? For example email addresses, home address and telephone number?

2020 -299

2019 - 264

The data the applicants receive is dependant on the information requested. An individual exercising their rights under the Data Protection Act is entitled to any personal information held about them (unless a restriction or exemption applies).

How many data breaches have you experienced for the past 5 years (broken down by each year).

2017	2018	2019	2020	2021 (up to 22/3/21)
22	56	100	89	24

THIS INFORMATION HAS BEEN PROVIDED IN RESPONSE TO A REQUEST
UNDER THE FREEDOM OF INFORMATION ACT 2000, AND IS CORRECT AS AT 22/03/2021