**Case Study 6:****The importance of data controllers having appropriate mechanisms in place to respond to access requests and document compliance.**

[*https://dataprotection.ie/en/pre-gdpr/case-studies#201806*](https://dataprotection.ie/en/pre-gdpr/case-studies#201806) **Specific Aspect of GDPR Addressed**

The case study focuses on the right of access under Article 15 of the GDPR. This right allows individuals to access their personal data and understand how it's being processed. The issue highlighted is eir’s failure to provide clear and complete information, including proper communication of statutory exemptions when withholding data.

**How was it resolved?**

The Data Protection Commission (DPC) directed eir to:

* eir had to reassess all personal data related to the complainant and reissue it with explanations.
* Provide reasons for withholding any data and explain the legal exemptions used.
* eir was required to copy its response to the DPC to ensure oversight.

The complainant withdrew the complaint after eir complied.

**If this was your organisation, what steps would you take as an Information Security Manager to mitigate the issue?**

* Strengthen Record-Keeping and implement systems to track and document data access requests and responses.
* Clear Procedures, Develop and communicate procedures for handling access requests and applying exemptions.
* Staff Training, regularly train staff on GDPR compliance and effective communication.
* Audit Compliance, regularly audit processes related to data requests to ensure GDPR adherence.
* Improve Communication and create clear templates for responding to requests, ensuring transparency and clarity.