



Your reference:

Our reference: FOI_25_0080

E-mail: FOI

@gloucestershire.police.uk

Direct dial: 01452 754304

Postal Address: As above

Date: 02/06/2025

Dear

Gloucestershire Constabulary Freedom of Information request FOI_25_0080

On 22/01/2025 you sent an email constituting a request under the Freedom of Information Act asking 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)?

Under the Freedom of Information Act 2000 s1, I can confirm that Gloucestershire Constabulary may hold some relevant information.

With regards to Q5, we are unable to differentiate between data breaches and security incidents on our systems, therefore to establish the information requested for this question would involve a manual review of all recorded incidents. Just for 2023 and 2024 there are 1,151 records. Applying an estimate of 3 minutes per record, a manual review would take in excess of 57 hours, therefore Section 12 of the Act is applicable. This section does not oblige a public authority to comply with a request for information if the authority estimated

that the cost of complying with the request would exceed the appropriate limit of 18 hours, equating to £450.00

You should consider this to be a refusal notice under Section 17 of the Act for this part of your request.

Section 17(5) of the Freedom of Information Act 2000 requires Gloucestershire Constabulary, when refusing to provide information (because the information is exempt) to provide you the applicant with a notice which: (a) states the fact, (b) specifies the exemption in question and (c) states (if not otherwise apparent) why the exemption applies.

In relation to your request Section 12 applies.

Section 12(1)– Fee Regulations states:

Section 1(1) of the Act 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 appropriate limit. (As detailed in the Data Protection and Freedom of Information Fees Regulations of 2004)

The appropriate limit at the moment is £450 calculated at an hourly rate of £25 per hour for all staff time incurred in:

- i. Determining whether information is held
- ii. Locating it
- iii. Retrieving it
- iv. Extracting the information to be disclosed from the other information.

In accordance with the Act, this letter represents a Refusal Notice for your request.

Providing Information Outside of the Act

By way of assistance and although excess cost removes the Force's obligations under the Freedom of Information Act, we have supplied the information relevant to your request which has already been retrieved. We trust this is helpful but it does not affect our legal right to rely on the fees regulations for the remainder of your request.

1. Gloucestershire Police does not sell personal data
2. This is available in the public domain, please see the below link:
[Cookies | Gloucestershire Constabulary](#)

3.

Year	Total
2023	50
2024	49

These complaints fall under the allegation categories of 'Accessing and handling of information from other sources', 'Disclosure of information', 'Handling of information', and 'Use of police systems'.

4.

Year	Total
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2023	377
2024	371

We do not hold as recorded information an assessment of the types of personal data that a requester will “typically receive” in response to these requests. Outside of our obligations under the Act, I can advise that typically what an individual will receive in response to a SAR is their own personal information contained within our local recording systems, such as incident reports and crime reports.

If you are not satisfied with this response or any actions taken in dealing with your request, you have the right to ask that we review your case under our internal procedure. Please note that a request for an internal review must be made within 20 working days of the response to your original request.

If you decide to request that such a review is undertaken and following this process you are still unsatisfied, you then have the right to direct your complaint to the Information Commissioner for consideration.

The Information Commissioner can be contacted via the following means:

Website - <https://ico.org.uk/>

Call their helpline - 0303 123 1113

Email - casework@ico.org.uk

Post –

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

Yours sincerely,

Disclosure Officer
Gloucestershire Constabulary