

GDPR | RIGHT OF ACCESS

Abusive DSARs: respond with judgement

Access requests remain one of the most visible tests of data protection maturity.

Why it matters

DSARs rarely stay within privacy alone

They touch HR, legal and compliance, may arise in litigation contexts and require consistent, traceable responses.

Hidden risk

Responding without criteria can expose more than it protects

Poor handling may disclose third-party data, weaken legal positions and demonstrate lack of governance.

Common mistake

Between giving everything and refusing almost everything

Both extremes are dangerous. What protects the organisation is documented judgement: limitation, refusal, redaction and third-party protection criteria.

Management question

Can the organisation explain each response?

Is there a decision matrix, legal review, reasoning record, third-party control, deadline governance and approval chain?

What to do now

Create a clear DSAR process

Map stakeholders, create analysis templates, train critical teams and document sensitive decisions. Good responses require triage, validation, documentation and consistency.

Conclusion

The test is not “do we answer everything?”

The test is whether the organisation can support every answer it gives. Ahkoris helps structure DSAR response processes with legal judgement, governance and operational defensibility.