

Re: Data Subject Access Request - Mr Mark Ashton

From evidence@mmalegal.co.uk <evidence@mmalegal.co.uk>

Date Wed 2026-06-03 1:19 PM

To DataProtection <DataProtection@south-ayrshire.gov.uk>

Good afternoon,

Many thanks for your email.

Unfortunately, we are unable to provide any further photographic identification. I note that a copy of our client's identification was submitted with the initial DSAR request and signed form of authority.

I understand your internal policies may request multiple forms of ID, but this is not a requirement under the Data Protection Act 2018 and UK GDPR.

In addition, the ICO guidance is extremely clear on this point. Your request for another form of ID is unnecessary, unreasonable, and is not proportionate to the request we have made for our client's data.

There can be no reasonable doubt about our client's identification, and given the evidence we have already provided, we expect to receive all requested information and documents you are in control of.

Should you disagree with our position, we expect to receive a substantive and reasoned response specifying exactly what ICO guidance or statutory authority you are relying upon in requesting multiple forms of identification. In the absence of which, we expect to receive the information within the defined timescales.

If we do not receive a prompt response to this email with the requested authorities and guidance you are relying upon, and do not receive the requested information in the coming weeks, we will have little option but to submit a complaint to the ICO - this will be submitted without further notice to yourself.

We trust this will not be necessary and look forward to hearing from you as soon as possible.

If you wish to discuss this email via telephone, please contact me on 0161 563 0816 and we would be happy to have a pragmatic discussion to overcome this issue.

I look forward to hearing from you.

Kind regards,

James
Investigations Team
MMA Legal

E: Evidence@mmalegal.co.uk
T: 0161 563 0816



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From: DataProtection <DataProtection@south-ayrshire.gov.uk>
Sent: 22 May 2026 10:07 AM
To: evidence@mmalegal.co.uk <evidence@mmalegal.co.uk>
Subject: Re: Data Subject Access Request - Mr Mark Ashton

Good Morning,

Thank you for your email.

Further to our previous correspondence, we confirm that we are happy to accept electronically signed letters of authority and do not require a wet ink signature in this instance. I apologise again for the earlier confusion regarding the wet ink signature.

Having reviewed the documentation provided, we are however unable to accept the saltire card submitted as photographic identification. Unfortunately, this document does not meet our identification requirements, as it does not contain sufficient identifying information to verify the data subject's identity for the purposes of processing the Subject Access Request.

To enable us to proceed, we would therefore be grateful if you could provide an alternative form of valid photographic ID for your client, such as a passport or driving licence. If your client doesn't have any further form of identification, please let us know and we will work with you to find a valid form of identification which would allow us to process your client's request.

For clarity, this request is made solely to ensure compliance with our obligations under data protection legislation and to safeguard personal data appropriately. Once acceptable photographic ID is received, we will be able to continue processing the request.

I trust this clarifies our position and look forward to receiving the requested documentation. Please do not hesitate to contact me if you require any additional discussion around this request.

Kind Regards,

Courtney

Information Governance | Chief Executive's Office | DataProtection@south-ayrshire.gov.uk | Direct Line: 01292 612223 | South Ayrshire Council | County Buildings | Wellington Square | Ayr | KA7 1DR | www.south-ayrshire.gov.uk

Oifigear Gàillidh Fiosrachaidh & Dàta | Seirbheisean Riaghlaidh Deamocratach | Prìomh Roinn Togalaichean Siorrachd | DataProtection@south-ayrshire.gov.uk | Tel: [01292 612223](tel:01292612223) | www.south-ayrshire.gov.uk

From: evidence@mmalegal.co.uk <evidence@mmalegal.co.uk>
Sent: Thursday, May 21, 2026 15:02
To: DataProtection <DataProtection@south-ayrshire.gov.uk>
Subject: Re: Data Subject Access Request - Mr Mark Ashton

Good morning/afternoon,

We write further to the above matter and to your previous correspondence requesting a “wet ink” signature.

The signed Letter of Authority was signed by our Client using our e-sign service. There are no specifications or requirements in which the SAR is to come over with wet ink.

The information provided allows you to see we have authority to act on behalf of our client, together with their ID and said form of authority.

The only requirement for a traditional wet-ink signature is for specific legal documents that demand a higher level of formality such as land transactions and wills.

A wet ink-signature for personal data is not required and as such, we look forward to your confirmation that you will now progress our SAR.

Should your position remain the same, please urgently clarify in writing before 5pm on 26th May 2026.

The Letter of Authority clearly stipulates the date and time the document was signed, in this instance, 16 February 2026 at 11:20 GMT and witness signed by our firm on 25 February 2026.

May we take this opportunity to remind you that we are under no obligations to provide you with any audit trails and any request for specific disclosure would need to be made via legal action.

We have provided a perfectly legible SAR request, with our Clients identification together with a signed letter of authority and their ID, all of which being dated within the last 6 months. We are not obliged to provide anything further.

Again, there are **no** specifications for a wet ink signature and any further push back for our request will be taken as avoidance and legal action will be taken.

We trust the need for a civil claim for specific disclosure will not be needed, however, should we proceed to such a stage, we will be seeking the costs of and occasioned to the same from South Ayrshire Council direct.

Please confirm before 5pm on 26 May 2026 that our SAR's sent on behalf of multiple clients will be processed with no further pushbacks. Should your position remain the same, please do provide me with your Data Protection Officer's details together with your senior managers details and your formal complaints process.

We look forward to hearing from you in due course.

Kind regards,
Investigations Team
MMA Legal

E: Evidence@mmalegal.co.uk
T: 0161 563 0816



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From: DataProtection <DataProtection@south-ayrshire.gov.uk>
Sent: 23 April 2026 4:24 PM

To: evidence@mmalegal.co.uk <evidence@mmalegal.co.uk>

Subject: Re: Data Subject Access Request - Mr Mark Ashton

Good afternoon

Thank you for contacting us to make a Subject Access Request on behalf of your client Mr Mark Ashton.

On checking your mandate, the signature that has been completed is by electronic typescript, we are unable to accept typewritten signatures, can you please arrange for your client to hand sign your mandate which will acknowledge his consent and return this to us to validate your request.

In addition, if your client is able to provide a Passport or Driving Licence as proof of ID this would be preferred. If your client is unable to provide either of these documents, please let us know and we will reconsider the request.

Once we receive the above documentation we will be in a position to take your request forward for you.

Kind regards,

Courtney

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From: MMA Legal <evidence@mmalegal.co.uk>

Sent: 22 April 2026 20:18

To: FOI <FOI@south-ayrshire.gov.uk>

Subject: Data Subject Access Request - Mr Mark Ashton

Subject: Data Subject Access Request under Article 15 UK GDPR and Section 45 DPA 2018

Client Name: Mr Mark Ashton

Client Address: 114 Dickson Drive, Irvine, KA12 9HD

Client Reference: 100145

Date of Birth: 02/07/1970

Also Known As:

Name in Care:

Dear Sir/Madam,

We act on behalf of the above-named individual who was placed in residential care at the institution(s) referenced below during the approximate period stated.

Approximate Dates of Placement:

- KirkMichael Care Home in Maybole: 1982-1984
- Thorntoun School: 1984-1985
- Keir Law in Stevenson: 1985-1987

We submit this request under Article 15 of the UK General Data Protection Regulation and the Data Protection Act 2018.

We expect a response within the statutory one calendar month period. If you require an extension, please confirm this in writing with full justification.

Please find the enclosed request.

We thank you for your assistance in this matter.

Yours faithfully,

Investigations Team
MMA Legal
E: evidence@mmalegal.co.uk
T: 0161 563 0816

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