



Guidance notes for Subject Access Requests

We've created these notes to help you fill in our Subject Access Request form – either online or on paper.

The basics

The General Data Protection Regulation (GDPR) Article 15 gives individuals the right to ask organisations that hold personal information about them, for access to that information. This right is called a Subject Access Request (SAR).

You can exercise this right at any time and there is generally no charge for a SAR. In some rare cases, we may need to charge you a reasonable fee, or may not be able to act on your request. Where that is the case, we'll let you know.

If you're a solicitor with a court order, please see Appendix 1 of these guidance notes. There is a dedicated email address you can use to contact us: court.disclosure@vodafone.com

Before you submit a SAR to us

If there's a problem and you're not happy, we'd like to address this – please get in touch with our [Customer Services](#)¹ team who will try their best to resolve the issue. If you've tried this and would like to take the issue further, you can lodge a [complaint](#)². This gives us the opportunity to fix it for you and may be more effective than raising a SAR.

We can give you some information without you needing to submit a SAR – see the next section.

If you still need to submit a SAR, please use our [SAR form](#)³

Other ways to get information

You may not need to submit a SAR and wait for information. By calling our [Customer Services](#)¹ team or logging in to [My Vodafone](#)⁴ you can quickly and easily get:

- Copies of your bill
- Details of your plan, including start and end dates

On our website you can also request [proofs of purchase \(receipts\)](#)⁵ for Vodafone mobile phones, or browse our [terms and conditions](#)⁶

Who can submit a SAR?

Only individuals have the right to submit a SAR. This means:

- Living people
- Sole trader businesses
- Authorised third parties acting on behalf of individuals (such as a solicitor, carer or relative)

Businesses and corporate accounts can't submit a SAR. So if you're a Vodafone customer seeking any information about a business account, we won't be able to help you under this process. You should contact our [Customer Services](#)¹ team or your account manager.

If you are either a relative of someone who has passed away, or you're the executor of an estate and you need access to information for administration purposes, please call our Bereavement team on **03333 048050** (standard call charges apply).

What you need to provide

Please fully complete our SAR form – online or on paper – clearly stating what information you're looking for. And provide all your contact details so our team can contact you about your SAR.

Please attach the following:

- Sufficient information to enable us to:
 - Identify your account
 - Locate the information you're seeking – such as account notes or call recordings. Please see the table later on in these notes outlining the information you can request
- Documents to confirm your identity and that you're entitled to access the information you're requesting
- Documents authorising any third parties to submit the SAR – including their proof of identity

Until we have all this information, we won't be able to deal with your request, nor are we obliged to under the legislation.

Completing our SAR form should help you make a successful request and avoid delays in it being processed.

We have **up to one calendar month** from receipt of your SAR to respond. In some cases, this period may be extended. If that is the case, we'll let you know. In the meantime, we'll let you know we've received your request.

We will try to respond as quickly as possible, but if you need your information sooner please let us know and we'll try to accommodate this.

What information might we have about you?

In line with good privacy and data protection principles, we minimise the personal data we hold about you. Many people believe we hold more information than we actually do. Whether we can provide you with what you want may depend on:

- The type of account you have with us
- The nature of the dealings that have passed between us
- The services that you use

Information that isn't available – even under a SAR

Content of calls, text or picture messages, or voicemail (see table *)

We're unable to provide you with information about the content of any calls, voicemail, texts or other messages. We don't record the content of the calls you make, or the content of your messages.

Copies of contracts

We may be unable to provide you with a copy of your signed contract. These aren't always held in a relevant filing system. This depends on when and how you took out your contract. Some may be stored digitally – so please contact our [Customer Services](#)¹ team for more information. We can provide you with copies of your terms and conditions – please continue reading for more details.

Information you can request under a SAR

Please read this information carefully before submitting a SAR.

Your service	Content of calls, messages or voicemail	Account notes and correspondence	Outgoing calls or messages from your mobile	Incoming calls and messages to your mobile (going back 12 months only)	Copies of call recordings to Vodafone customer services (*if available)	Copy of your bills	Copy of your contract
				*See note 1. *See note 4 (if driving offence related)	* See note 2		*See note 3
Pay monthly	x	✓	✓	Court order only	✓	✓	*See note 3
Pay as you go: registered with My Vodafone	x	✓	✓	Court order only	✓	n/a	n/a
Pay as you go: unregistered	x	Court order only	Court order only	Court order only	Court order only	n/a	n/a

Note 1

We store records of incoming calls, texts and other messages (but not the content of them) for a 12-month period only. We can't provide details of incoming calls or messages older than 12 months.

We won't provide details of incoming calls unless we have a court order. This is to protect the privacy of the individual who made the call. Please see the court order section if you need incoming caller information.

Note 2

We don't record all of the calls made to our call centres. Those that are recorded are generally only retained for up to 12 months (it can be less, depending on the nature of the call). Because of this, the specific call recording that you are seeking may not always be available.

Note 3

We can only provide signed copies of contracts if you're a Pay monthly customer – it also depends on how

and when you took out your contract and if they are stored digitally. We can provide terms and conditions, and plan information.

Note 4

If you've been charged with a driving offence related to mobile phone use, to assist you in court we can provide you with your list of:

- Incoming calls, texts and picture messages – without any originating numbers
- Outgoing calls, texts and picture messages

Proof that you've been charged by the police must be provided with your SAR. We will only have the preceding 12 months of incoming call, text and picture message data.

Appendix 1

Court orders and witness summons

For us to disclose the information we hold that isn't available through the SAR process – namely incoming records complete with the caller's number, or any information relating to unregistered Pay as you go customers – we'll need to receive a court order or witness summons.

To help us process the court order/witness summons without needing to further clarify information – or possibly reject the request – please ensure the following:

- It's the final sealed/signed version
- It directs Vodafone Limited to disclose
- It states the relevant phone number
- It states start and end dates for the information required
- It states the type of information required, for example voice calls/texts/picture messages
- It states the direction of information required, for example outgoing only/incoming only/outgoing and incoming
- It states which individual/entity the information needs to be disclosed to

There may be circumstances in which we'll still need to reject the request made in the court order/witness summons, even if you've provided the above information.

Court orders/witness summons can be emailed to: court.disclosure@vodafone.com

Links in this document

¹ Customer services: vodafone.co.uk/contact-us

² Complaints team: vodafone.co.uk/vodafone-uk/complaints

³ SAR form: vodafone.co.uk/gdpr-sars-form

⁴ My Vodafone: vodafone.co.uk/myvodafone

⁵ Proofs of purchase (receipts): vodafone.co.uk/vodafone-uk/forms/proof-of-purchase

⁶ Terms and conditions: vodafone.co.uk/about-this-site/terms-and-conditions