

# Data Sharing DPA Considerations

**DRAFT**  
Experian

Advise  
requestor  
to obtain  
specific  
consent

“Reacting to a request to access  
data I hold as the data controller”

Q1 - Is there a statutory obligation for me to  
provide this information to the requestor? e.g. SSFA

No

Q2 - Is there a statutory or other prohibition  
preventing me from sharing this data?

No

Q3 - Did I notify the individual at the time their  
data was collected that it would be used in this way?  
And if so did they freely give their consent?  
(in the case of sensitive data, their explicit consent)

No

Q4 - Has the requestor obtained specific consent from  
the individual to allow the requestor to initiate the  
request to me and obtain the information from me?

No

Q5 - Would it involve a disproportionate effort to inform  
the individual that his data would be used in this way?

Yes

Q6 - Is the data requested sensitive  
e.g. from racial, ethnic, physical  
or mental health perspectives?

No

Q6A - Does the  
processing meet  
a Schedule 3  
condition?

No

Q7 - Does the processing meet  
a Schedule 2  
condition?  
e.g. legitimate interest test.

Yes

Yes

Yes

Ref: Schedule 2  
Part II para 3

Ref: Section 2  
Definition

Yes

Yes

No

Yes

No

Ref:  
1st & 2nd  
Principles

Ref: 1st  
Principle  
& Schedule 2  
para 1

**Share  
The Data**

**Do Not  
Share  
The Data**