As DPO of a large ministry, my main concern is your proposals concerning the answer that must be given to unprecise requests.

We hold a very great amount of processings (national files such as ID cards or passports, driving licenses, vehicle registration, visa applications, gun holders, law enforcement, police inquiries, public safety, but also local files such as voters registers, founders of non-profit associations, CCTV authorizations, local police files, etc.). According to French law, cross-indexation or interconnection of all the files of our ministry is forbidden. It means that in case of a request expressed in very general terms, we would have to check by hand thousands of files processed by hundreds of different administrative services, since we don't have and can't legally have any automatic tool to search for all the data. Such a process is not conceivable. The position expressed in your guidelines would compel us to create a cross-indexation or an interconnection of all administrative files, which is quite contrary to our privacy tradition (though I know that other MS don't necessarily share this point of view).

As citizens are informed of our processings through the publication at the *Journal officiel* of each act authorizing the processing, they should be able to express precise requests. Any unprecise request should be regarded as excessive.

I therefore refer to Recital (63) GDPR: "Where the controller processes a large quantity of information concerning the data subject, the controller should be able to request that, before the information is delivered, the data subject specify the information or processing activities to which the request relates ». Your proposals in §35(b), 123, 145, 164, and 186, seem not to be compliant with this Recital.

Last, unprecise requests are often expressed by people who wish to harass the administration. In §188, you propose that a request may be found excessive if "*the individual systematically sends different requests to a controller as part of a campaign, e.g. once a week, with the intention and the effect of causing disruption*". I suggest that this notion of "*campaign*" should also be extended to several people, each expressing the same standard request, even if each person sends only one request.