

## **Annex A**

### **Request**

Correspondence between the FSA and Finnebrogue about Prosur Natpre-T10 food flavouring from 24 May 2018 (i.e. the end date of the data published by the FSA in the link <https://fsa-catalogue2.s3.eu-west-2.amazonaws.com/FOI+2476+-+Annex+D.pdf> ) to the date your request was first made (i.e. 15 November 2020).

### **Response**

Searches were conducted for emails and other correspondence relating to the product Natpre T-10 manufactured by Prosur. This information is provided in Annex D of this letter; a schedule of documents is provided at Annex C. Please note that some information has been withheld under section 40 of the Act. Further information regarding the use of this exemption can be found in Annex B of the letter.

## **Annex B**

### **Section 40 (Personal Information)**

Some information has been withheld as it contains personal details relating to third parties. We consider that it would be disproportionate to publicly disclose these personal details, unless there was a strong public interest to do so.

These individuals have a legitimate and reasonable expectation that their personal details will not be disclosed in the context in which it is held. Disclosures under the Act are not just to those who request it but to the world at large.

Article 5(1)(a) of the General Data Protection Regulations (GDPR) and Section 35 (1) of the Data Protection Act 2018 (DPA) requires the processing of personal data to be fair and lawful.

On balance, we do not consider there to be a legitimate public interest in disclosing this information. Disclosure of this information would contravene the first data protection principle, particularly that to process the data in this way (i.e. by disclosure to the public) would not be fair in all the circumstances. Furthermore, we do not consider that Art 6 (1) of the GDPR is satisfied in that disclosure would not be lawful. Therefore, the information is exempt under section 40(2) and (3) of the Act.

## Annex C – Schedule of Documents Released

<b>Communication</b>	<b>Date</b>	<b>Correspondent</b>	<b>Description</b>
1	04/07/2018	Forde Campbell LLC	Email and letter to FSA regarding a FOI request.
2	09/07/2018	Declan Ferguson	Email to FSA regarding further information on Prosur product.
3	10/07/2018	David Self	Email to Finnebrogue regarding FSA action.
4	10/07/2018	Forde Campbell LLC	Email to FSA requesting clarity on FSA action.