



Llywodraeth Cymru
Welsh Government

24 September 2026

Dear ,

ATISN 27305 – Star Wars

Thank you for your request which I received on 4 August. You asked for:

Information on Welsh-language dubbing of Star Wars: A New Hope:

1. How much funding has Creative Wales and/or the Welsh Government committed to this project?
2. Which department or funding programme is providing this funding?
3. What is the total value of any grant or financial contribution made?
4. If funding has been awarded through a grant agreement, please provide a copy of the grant award letter or funding agreement, with any commercially sensitive information redacted if necessary.
5. If the total budget for the project is held by Creative Wales, please provide the overall project budget.

Our response

Please see our answers below:

1. This information is withheld under Section 43(2) – Commercial in Confidence.
2. This information is in the public domain and funding was provided by Creative Wales.
3. This information is withheld under Section 43(2) – Commercial in Confidence.
4. A copy of the grant award letter is provided in a separate document to this response. Please note that elements of the grant award letter have been redacted under Section 40(2) – Personal Information and Section 43(2) – Commercial in Confidence with each redaction clearly marked.
5. This information is withheld under Section 43(2) – Commercial in Confidence.

Reason for withholding information under Section 43(2) – Commercial in Confidence

We consider that section 43(2) is engaged in this matter.

S4C as the funding partner of this project have been consulted and provided evidence that disclosure would, or would be likely to, prejudice S4C's commercial interests. The relevant information reveals aspects of 3rd party financing, production and commercial arrangements in relation to the production.

Disclosure would provide third parties, including commercial counterparties, competitors, financiers, distributors and/or other parties with whom S4C negotiates, with information from which they could infer S4C's commercial position and negotiating parameters.

In particular, disclosure of the detailed grant amount, payment structure, budget requirements, financing terms, recoupment provisions, rights arrangements would prejudice S4C's commercial interests by revealing commercially sensitive information concerning its financing and production arrangements, and would enable competitors, producers, distributors and other commercial counterparties to infer S4C's financial and negotiating position. This would place S4C at a disadvantage in current and future negotiations and could result in less favourable commercial terms, increased costs and/or reduced revenues in relation to the production and other productions.

There is a causal connection between disclosure of the specific information and the anticipated commercial harm because the sensitivity of this information is particularly relevant as the production is yet to be released, and forms part of a wider production and commissioning strategy.

We have therefore considered this evidence and concluded that disclosure would, or would be likely to, prejudice S4C's commercial interests for the purposes of section 43(2) and applied the relevant redactions.

Engagement of S40(2) – Personal Data

The Welsh Government believes the personal data contained in the information being released with this request should be exempt from disclosure

Section 40(2) of the Freedom of Information Act 2000 (FOIA), together with the conditions in section 40(3)(a)(i) or 40(3)(b), provides an absolute exemption if disclosure of the personal data would breach any of the data protection principles.

'Personal data' is defined in sections 3(2) and (3) of the Data Protection Act 2018 ('the DPA 2018') and means any information relating to an identified or identifiable living individual. An identifiable living individual is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of the individual.

We have concluded that, in this instance, some of the information contained within the information caught by your request contains third party personal data.

Specifically, this relates to names of Welsh Government officials, their e-mail addresses and direct telephone numbers, and also the names and personal data of third parties.

Under Section 40(2) of the FOIA, personal data is exempt from release if disclosure would breach one of the data protection principles set out in Article 5 of the UK GDPR. We consider the principle being most relevant in this instance as being the first. This states that personal data must be:

“processed lawfully, fairly and in a transparent manner in relation to the data subject”

The lawful basis that is most relevant in relation to a request for information under the FOIA is Article 6(1)(f) of the UK GDPR. This states:

“processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child”.

In considering the application of Article 6(1)(f) in the context of a request for information under FOIA it is necessary to consider the following three-part test:

1. The Legitimate interest test: Whether a legitimate interest is being pursued in the request for information;
2. The Necessity test: Whether disclosure of the information/confirmation or denial that it is held is necessary to meet the legitimate interest in question;
3. The Balancing test: Whether the above interests override the interests, fundamental rights and freedoms of the data subject.

Our consideration of these tests is set out below:

1. Legitimate Interest Test

The Welsh Government recognises there is a legitimate interest in being able to identify the parties involved in any communication in order to follow the flow of that communication and to understand the views and positions expressed by each party. We do not believe, however, there is any legitimate reason why the personal data would need to be released in order to follow and understand those communications. The views expressed in the communications are those of the respective organisations rather than those of the individuals concerned. As such it is irrelevant as to who made those comments. The Welsh Government cannot identify any other legitimate interest in you or the public receiving the personal data captured by your request.

2. Is disclosure necessary?

The Welsh Government is of the view that it is not necessary to disclose the personal information caught by your request. It is straight forward, even when withholding the personal data, to follow the discussions and to identify the views expressed by each organisation. As such we do not believe it is necessary to

disclose the personal data to allow the conversations to be followed. The Welsh Government officials are not Senior Civil Servants and do not have public facing roles, therefore they would not expect their names to be released into the public domain.

3. The Balancing Test

As it has been concluded that there is no necessity to disclose the personal data of another individual, the fundamental rights and freedoms of the affected third party prevail in this instance and releasing the information cannot be justified under Article 6(1)(f).

Conclusion

To conclude, as release of the information would not be legitimate under Article 6(1)(f), and as no other condition of Article 6 is deemed to apply, release of the information would not be lawful within the meaning of the first data protection principle. It has therefore been withheld under section 40 of the Freedom of Information Act. Section 40 is an absolute exemption and not subject to the public interest test.

If you are dissatisfied with the Welsh Government's handling of your request, you can ask for an internal review within 40 working days of the date of this response. Requests for an internal review should be addressed to the Welsh Government's Freedom of Information Officer at:

Information Rights Unit,
Welsh Government,
Cathays Park,
Cardiff,
CF10 3NQ

or Email: Freedom.ofinformation@gov.wales

Please remember to quote the ATISN reference number above.

You also have the right to complain to the Information Commissioner. The Information Commissioner can be contacted at:

Information Commissioner's Office,
Wycliffe House,
Water Lane,
Wilmslow,
Cheshire,
SK9 5AF.

However, please note that the Commissioner will not normally investigate a complaint until it has been through our own internal review process.

Yours sincerely