

Subject Access Request Procedure

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Confidentiality Level:	Internal: Uncontrolled if printed

This Subject Access Request Form is a controlled document and is maintained on the server as read-only. The Data Protection representative must ensure that all amendments are circulated, and obsolete copies removed and filed. Hard copies used for training and internal auditing are controlled and distributed as follows.

Circulation List

Date	Distribution List
13 May 2020	All Staff

Amendment History

This document is reviewed periodically, at least annually, and is retained for a period of 5 Years. Amendments and revisions are distributed to all Staff. The history of amendments and the issue of revisions are recorded below.

Date	Amend. No.	Page No.	New Issue No.	Reason for Change	Authorised by

Copies of this document other than those listed above will not be revised; such copies will be marked as **UNCONTROLLED**.

Scope

All personal data processed by Caraline is in scope of this procedure. This procedure excludes personal data that is asked for as a matter of routine standard services offered by Caraline. An example of routine services offered within the customer agreement and expectations are an Example of routine service as part of the agreement with the customer.

SAR Overview

A SAR request can be made by Data subjects who understand that Caraline is processing any personal data about that individual. Caraline will respond within GDPR (30 days from verification).

The initial SAR request is free of charge. Caraline may charge a 'reasonable fee' for any additional requests if they are deemed manifestly unfounded, excessive or repetitive (*this will be decided together with the DPO on case basis*). Caraline may also extend the response time by a further two months where requests are complex or numerous. If this is the case the individual will be informed within a month from the initial request.

Responses

SAR responses will contain a description of the personal data that Caraline holds; the purpose of processing, details of which staff have access to the data, the source of the data.

Responsibilities

The Data Controller is responsible for handling all SARs, maintaining the procedure and ensuring GDPR compliance.

Procedure

- Subject Access Request procedure requires the individual to be verified. The verification process has three steps:
 1. If SAR received by email check email matches records*
 2. Request scanned copy of Driving Licence or Passport
 3. Ask two verification questions (via phone or email) from the list below**:
 - Branch/Office location Data Subject registered details
 - Name of Therapist or Group the individual frequently liaised with
 - Year relationship commenced
 - Date of last transaction
 - Amount of last transaction
- * If email does not match ask the individual to send request from email account registered – If he/she cannot refer to DPO
- ** Both questions must be answered correctly. If there is a doubt refer to DPO
- Points 1,2, & 3 must be completed to action SAR
- The date will be recorded and 30 days from this date to provide the requested information or a reasonable explanation that Caraline will be extending the response time to three months due to the complex nature of the request.

- Applications are sent to the Data Controller. The Data Protection Officer is responsible for ensuring the SAR is processed within the GDPR.
- The Data Controller is responsible for ensuring all company data is reviewed against the SAR request. This may include searching all databases, all relevant filing systems (manual files) in Caraline, including all backup and archived files, whether computerised or manual, all e-mail folders and archives.
- The Data Controller maintains an Asset Inventory that identifies where all data in Caraline is stored.
- The Data Controller maintains a record of requests.
- The Data Protection Officer is responsible for reviewing all provided documents to identify whether any third parties are processing data linked to the SAR request.
- Information that may be excluded from the SAR responses - Crime prevention and detection, Negotiations with the requester, Management forecasts, Confidential references, Information used for research or historical or statistical purposes, Information covered by legal professional privilege.
- The SAR response may be provided to the data subject in electronic format, paper format or a reasonable format.
- The electronic formats used for responses to SARs are: List common formats that are readily compatible or machine-readable

Document Management

This document is valid as of 13 May 2020.

This document is reviewed periodically and at least annually to ensure compliance with the following prescribed criteria.

- General Data Protection Regulation
- Legislative requirements defined by law, where appropriate

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Data Protection Officer