

Subject Access Request (SAR) policy

Bramfield and Thorington Parish Council (B&TC)

Reviewed and Adopted November 2023

Upon receipt of a SAR, B&TC will:

- Verify whether they are controller of the data subject's personal data. If B&TC is not a controller, but merely a processor, the data subject will be informed and referred to the actual controller.
- Verify the identity of the data subject; further evidence on the identity of the data subject may be requested before the SAR is progressed.
- Verify the access request; is it sufficiently substantiated? Is it clear to the data controller what personal data is requested? If not, additional information may be requested before the SAR is progressed
- Verify whether requests are unfounded or excessive (in particular because of their repetitive character); if so, B&TC may either refuse to act on the request or charge a reasonable fee.
- Promptly acknowledge receipt of the SAR and inform the data subject of any costs involved in the processing of the SAR.
- Verify whether B&TC processes the data requested. If B&TC do not process any data, the data subject will be informed accordingly.
- Ensure data will not be changed as a result of the SAR. Routine changes as part of the processing activities concerned are permitted however and may occur
- Verify whether the data requested also involves data on other data subjects and make sure this data is removed before the requested data is supplied to the data subject; if data cannot be removed, ensure that other data subjects have consented to the supply of their data as part of the SAR.

Responding to a SAR

B&TC will normally respond to an SAR within one month after receipt of the request:

- (i) If more time is needed to respond to complex requests, an extension of another two months is permissible, but if this is the case then this will be communicated to the data subject in a timely manner within the first month;
- (ii) If B&TC cannot provide the information requested, it will inform the data subject on this decision without delay and at the latest within one month of receipt of the request.

If a SAR is submitted in electronic form, any personal data will also be provided by electronic means, wherever possible.

Where the SAR relates to data that is being processed, the response from B&TC will include:

- (i) the purposes of the processing;
- (ii) the categories of personal data concerned;
- (iii) the recipients or categories of recipients to whom personal data has been or will be disclosed
- (iv) where possible, the envisaged period for which personal data will be stored, or, if not possible, the criteria used to determine that period;
- (v) the existence of the right to request rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing;

(vi) the right to lodge a complaint with the Information Commissioners Office (“ICO”);

(vii) if the data has not been collected from the data subject: the source of such data;

(viii) the existence of any automated decision-making, including profiling and any meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

B&TC will provide a copy of the relevant personal data undergoing processing.