

Company Name: Integrative Supported Living Care

Policy No: 03-1517	Authorised: Pellagia Margolis	Date: 15/01/2020
SUBJECT ACCESS REQUESTS (SARs) POLICY (GDPR)		

This Policy identifies the actions to be taken to process Subject Access Requests (SARs) efficiently and in compliance with the GDPR.

POLICY IMPLEMENTATION:

1. Management Principles – Summary:

The Organisation will implement the following principles in respect of processing a SAR:

- 1.1 Inform data subjects of their right to access data and provide an easily accessible process through which such a request can be submitted (for example; a dedicated e-mail address).
- 1.2 Ensure a SAR policy is in place within the business and that internal procedures on handling of SARs are accurate and complied with. Include the following, as relevant;
 - 1.2.1 Responsibilities
 - 1.2.2 Timing
 - 1.2.3 Any changes to data
 - 1.2.4 Handling requests for rectification, amendment, redaction, erasure or restriction of processing.
- 1.3 Ensure personal data is easily accessible at all times in order to ensure a timely response to SARs and that personal data on specific data subjects can be easily filtered.
- 1.4 Where possible, develop standards to respond to SARs, including a standard response.

2. Action to be taken - Upon Receipt of a SAR:

- 2.1 Verify the controller of the data subject's personal data. If not a controller, but merely a processor, inform the data subject and refer them to the actual controller.
- 2.2 Verify the identity of the data subject; if needed, request further evidence of the identity of the data subject.
- 2.3 Verify the access request to ensure that it is clear to the data controller what information is requested, and whether any additional information is needed.
- 2.4 Verify whether requests are unfounded or excessive (in particular because of their repetitive character). If so, the controller can refuse to act on the request or, under appropriate circumstances, charge a reasonable fee.
- 2.5 Promptly acknowledge receipt of the SAR and inform the data subject of any costs involved in the processing of the SAR.
- 2.6 Verify whether the data can be processed as requested. If not authorized to process data, the data subject will be informed accordingly. Ensure that the internal SAR policy is followed at all times and progress can be monitored.
- 2.7 Ensure data will not be changed as a result of the SAR. Routine changes as part of the processing activities concerned are permitted.

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2.8 Verify whether the data requested also involves data on other data subjects. Ensure that this data is filtered before the requested data is supplied to the data subject. If data cannot be filtered, ensure that other data subjects have consented to the supply of their data as part of the SAR.

3. Action to be taken - Responding to a SAR:

- 3.1 Response to a SAR must be made within one month after receipt of the request. If more time is needed to respond to complex requests, an extension of another two months is permissible, provided this is communicated to the data subject in a timely manner within the first month.
- 3.2 If no action is to be taken on the data subject's request, the data subject will be informed of this decision without delay and at the latest within one month of receipt of the request.
- 3.3 If a SAR is submitted in electronic form, any SAR response information should also be provided by electronic means wherever possible.
- 3.4 If data on the data subject is processed, ensure the following information is provided as a minimum in the SAR response:
- 3.4.1 the purposes of the processing;
 - 3.4.2 the categories of personal data concerned;
 - 3.4.3 the recipients or categories of recipients to whom personal data has been, or will be, disclosed.
 - 3.4.4 where possible, the retention period for which personal data will be stored, or, if not possible, the criteria used to determine that period;
 - 3.4.5 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;
 - 3.4.6 the right to lodge a complaint with a supervisory authority;
 - 3.4.7 where the data has not been collected from the data subject directly - the source of such data;
 - 3.4.8 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.
- 3.5 Provide a copy of the personal data undergoing processing. This should be provided in a commonly used electronic form if the data subject has submitted the SAR electronically.