

Kedington Parish Council

Subject Access Request Policy

Persons can request information about their personal data held by Kedington Parish Council from time to time. This policy describes the relevant procedures.

1. Upon receipt of a Subject Access Request (SAR), Kedington Parish Council (KPC) will:

- a) Verify whether KPC is the controller of the data subject's personal data. If it is not a controller, but merely a processor, KPC will inform the data subject and refer them to the actual controller.
- b) Verify the identity of the data subject; if needed, request any further evidence on the identity of the data subject.
- c) Verify the access request; is it sufficiently substantiated? Is it clear to the data controller what personal data is requested? If not: request additional information.
- d) Verify whether requests are unfounded or excessive (in particular because of their repetitive character); if so, KPC may refuse to act on the request or charge a reasonable fee.
- e) Promptly acknowledge receipt of the SAR and inform the data subject of any costs involved in the processing of the SAR.
- f) Verify whether KPC processes the data requested. If it does not process any data, inform the data subject accordingly. At all times make sure the internal SAR procedure is followed and progress can be monitored.
- g) Ensure data will not be changed as a result of the SAR. Routine changes as part of the processing activities concerned are permitted.
- h) Verify whether the data requested also involves data on other data subjects and make sure 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.

2. Responding to a SAR

- a) KPC will respond to a 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, provided this is communicated to the data subject in a timely manner within the first month;
 - (ii) if KPC cannot provide the information requested, it should inform the data subject on this decision without delay and at the latest within one month of receipt of the request.
- b) If a SAR is submitted in electronic form, any personal data should preferably be provided by electronic means as well.

- c) If data on the data subject is processed, make sure to include as a minimum the following information in the SAR response:
- (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, in particular in third countries or international organisations, including any appropriate safeguards for transfer of data, such as Binding Corporate Rules or EU model clauses;
 - (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.
- d) KPC will provide a copy of the personal data undergoing processing.

Adopted by Kedington Parish Council at its meeting on 21st March 2023

Agenda item 8.6

Review Date Feb 2025

Please see below for a [Subject Access Request](#) letter or email template from the Information Commissioner's Office

[Name and address of the organisation]

[Your name and full postal address]

[Your contact number]

[Your email address]

[The date]

Dear Sir or Madam

Subject access request

[Include your full name and other relevant details to help identify you].

Please supply the personal data you hold about me, which I am entitled to receive under data protection law, held in:

[Give specific details of where to search for the personal data you want, for example:

- my personnel file;
- emails between 'person A' and 'person B' (from 1 June 2017 to 1 Sept 2017)
- my medical records (between 2014 and 2017) held by 'Dr C' at 'hospital D';
- the CCTV camera situated at ('location E') on 23 May 2017 between 11am and 5pm; and
- financial statements (between 2013 and 2017) held in account number xxxxx.]

If you need any more information, please let me know as soon as possible.

[If relevant, state whether you would prefer to receive the data in a particular electronic format, or printed out].

It may be helpful for you to know that data protection law requires you to respond to a request for personal data within one calendar month.

If you do not normally deal with these requests, please pass this letter to your data protection officer or relevant staff member.

If you need advice on dealing with this request, the Information Commissioner's Office can assist you. Its website is ico.org.uk, or it can be contacted on 0303 123 1113.

Yours faithfully

[Signature]