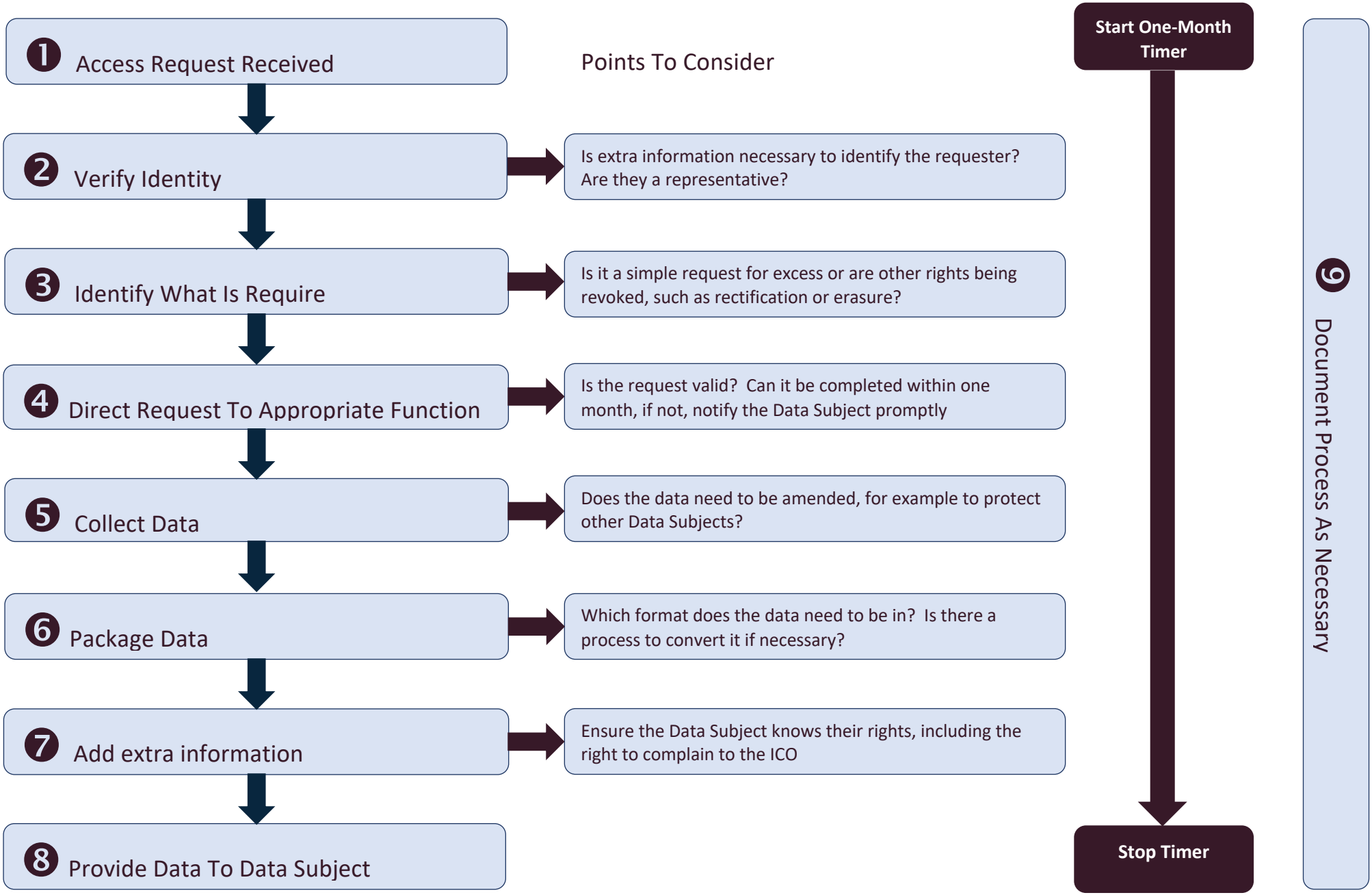
Data Subject Access Request

Procedure & Register

Data Subject Access Request Procedure



❶	**Access Request Received** Identify the DSAR. Be aware that DSARs may be submitted verbally face to face or by telephone, by E-Mail, letter or direct message via social media.		❺ Contd	Sensitive data relating to any person other than the Data Subject requesting the DSAR **must be removed.**
❷	**Verify Identity** We must protect the confidentiality of personal data, it is therefore essential that we verify the identify of the person submitting the DSAR to ensure we are providing data to the correct individual. If the request comes from someone other than the Data Subject, we must request appropriate proof to demonstrate they are legally acting on behalf of the Data Subject.		❻	**Packaging The Data** Where the DSAR is made electronically, the GDPR compels us to respond electronically, unless specially requested otherwise by the Data Subject. Electronic data will be provided to the client in a 'commonly used' electronic format. This may be as a Word, Excel or PDF document, depending on the data being requested.
❸	**Identify What Is Being Requested** We must establish whether the Data Subject is requesting access to all or just some of their information. In addition to the above, we need to understand whether the Data Subject is asserting any other rights granted to them under GDPR. We are aware that failure to facilitate these rights could result in a fine in the higher bracket or other penalties.		❼	**Add Extra Information** As part of our response to the DSAR, we will provide the Data Subject with details about their full rights under GDPR. This will be done by way of enclosure of our Privacy Notice within our response.
❹	**Direct Request To Appropriate Function** Granting access to different rights might come within different functions within the firm. On receipt of the DSAR, Peter James should be informed immediately so they can respond accordingly and ensure that if necessary, a cross-departmental response can be facilitated promptly.		❽	**Provide Data to Data Subject** Once we have collated the information, this **must be sent to the Data Subject in a secure format.** Our response will be provided no later than 30 days from receipt of the original access request. Should the request be complex in nature, we reserve the right to take a further 2 calendar months to complete the request and will advise the Data Subject if the extra time is required, within the first 30 days of receipt of their request.
❺	**Collect Data** Peter James is responsible for collating data. Before any data is provided to the Data Subject, checks must be undertaken to remove any data in the information that may relate to another Data Subject, unless they have consented to us sharing their data or it is 'reasonable' to share without their consent.		❾	**Document The Process As Necessary** Peter James must be notified of the DSAR immediately in order that the response process can be fully documented. This ensures that we can keep track of the response and make sure any questions are asked at the correct stage in the process. Each DSAR will be logged in our DSAR Register which records who sent the request, when it was received, what information the Data Subject is trying to access and the date the DSAR was completed.

Data Subject Access Request Register

DSAR 1 Details				
Data Subject (Name)	**Our Ref**	**DSAR Method (E-Mail, Phone etc)**	**Data Requested – Full/Limited If Limited, Provide Details**	**Additional Rights Being Exercised? If Yes, Provide Details**
Internal Process				
Who Took DSAR?	**Who Managed DSAR?**	**Was There Cross-Departmental Involvement?**		
Time Frames				
Date DSAR Received	**Date Info Was Sent to Data Subject**	**Time Taken (Days) To Complete DSAR**	**If More Than 30 Days Required, Why?**	**Comments (Any Issues Highlighted As A Result of DSAR?)**

DSAR 2 Details				
Data Subject (Name)	**Our Ref**	**DSAR Method (E-Mail, Phone etc)**	**Data Requested – Full/Limited If Limited, Provide Details**	**Additional Rights Being Exercised? If Yes, Provide Details**
Internal Process				
Who Took DSAR?	**Who Managed DSAR?**	**Was There Cross-Departmental Involvement?**		
Time Frames				
Date DSAR Received	**Date Info Was Sent to Data Subject**	**Time Taken (Days) To Complete DSAR**	**If More Than 30 Days Required, Why?**	**Comments (Any Issues Highlighted As A Result of DSAR?)**