



Subject Access Request Procedure

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Title	Subject Access Request Procedure			
Description	Framework for the management of requests for personal information for natural living individuals under the General Data Protection Regulation (GDPR).			
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Purpose

This procedure provides DE Photo (Franchising) Ltd (referred to as the company here after) with an overarching framework for the management of requests for personal information for natural living individuals under the General Data Protection Regulation (GDPR). It defines a process for achieving legislative requirements and ensuring effective and consistent management of requests.

Prerequisites

For this procedure to be followed the following conditions need to be met:

- All parties need to be aware of their roles and responsibilities.
- The Data Protection Policy and Legitimate Interests Assessment (LIA) need to be current and available to the relevant parties.
- All relevant parties need appropriate access to:
Dropbox - GDPR123\Documents\Final Documents
- All parties have had the relevant training and the training is current and up to date.

Conditions

A request has been made to access personal information held.

The request contains information to perform validation.

The request contains actionable information.

The request pertains to ongoing processing.

All logs and checks are available to document the request.

Outcomes

Data subject is responded to within 1 month

Data Access Request is fulfilled

Data Access Request is logged and stored

Processes

Verifying the request sub-process

1. Where a communication has been made it should be considered an access request if:
 - a. The communication has been made on behalf of a data subject.
 - b. There is a request for access to information relating to that same data subject.
2. Where the communication has been identified as a subject access request, the identity of the data subject must be validated before the request can be handled. The subject should provide official identification which is only to be stored for the duration of the request in:
Dropbox - GDPR123\Documents\ID Verification

Enacting the request sub-process

This sub-process must be completed within 30 days of receiving the request. Where it seems likely that this will not be the case, the data subject should be contacted and informed of a reasonable timeframe to receive the information and the reasons for the delay.

1. Create a folder in:
Dropbox - GDPR123\Documents\Subject Access Request (SAR)
with name [Branch Code]-[Request Surname]-[Date] - for example HO-Moore-16-05-2018
2. Open a copy of the appropriate subject access request response template:
DE-GDPR-0039 - Subject Access Request Response Template
and save it to the folder created in step one of this sub-process with the name
[Branch Code]-[Request Surname]-[Date]-[Document Number] – for example HO-Moore-16-05-2018-001
3. Use the DE-GDPR-0037 - Information Asset Register (IAR) found in:
Dropbox: GDPR123\Documents\Final Documents
to fill in the subject access request response.
4. Export the data from the systems and compile it in a single record, separating it into sections within the compiled record. For example, data extracted from System 1 would be listed in Section 1.

Responding to the data subject sub-process

1. Where the request was made by electronic means, the data subject should be emailed instructions on how to access the record and a copy of the email saved to the folder created in step one of the section “Enacting the Request Sub-process”.
2. Where the request was made by post, the compiled record and the completed subject access request response form should be printed off and posted to the data subject with the proof of posting stored in the folder created in step one of the “Enacting the Request Sub-process”.

Management and Review

This policy should be reviewed as scheduled once annually unless performance indicators, changes to legislation or the organisation necessitate it.

Last Review Date: 16/05/2018

Next Review Date: 16/05/2019