

DSAR Policy Template

A free, adaptable template covering how to recognize, verify, search for, and answer a data subject request. Includes a request form, an identity verification matrix, four response letters, log fields, and a search and redaction checklist. Mapped to GDPR and CCPA deadlines.

HOW TO USE THIS TEMPLATE

Replace every [bracketed value] with your own. Delete any section that does not apply, keep the numbering, and route the final version through your normal approval process, including review by privacy counsel. The internal targets are recommended defaults, not legal requirements: the legal deadlines come from the GDPR (Article 12) and California's regulations (11 CCR 7021). Write rules you can show evidence for every quarter.

Company: [Company name]

Policy owner: [Role, e.g. Privacy Owner]

Version: [1.0]

Effective date: [Date]

Approved by: [Name, title]

Next review: [Date, at least annually]

1. Purpose and scope

[Company] respects the rights of people whose personal data we hold. This policy explains how we recognize, verify, search for, and respond to requests to access, correct, or delete personal data. It applies to customers, employees, contractors, applicants, and anyone else whose personal data we process.

Related documents. Privacy notice, Data Retention Policy, Data Classification Policy, Incident Response Plan.

2. Definitions

Term	Meaning in this policy
Personal data	Information that relates to an identified or identifiable person
Requester	The person asking about their own data, or an authorized agent acting for them
DSAR	A data subject access request: a request to see the personal data we hold about the requester
Related requests	Requests to correct or delete personal data, which this policy handles the same way. California calls the family "requests to know, delete, and correct"

Clock start	The day any person at [Company] receives the request, by any channel
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3. Roles and owners

Role	Responsibility
Privacy Owner [Role]	Owns this policy, logs every request, sends the letters, and decides redaction and refusal questions with counsel
Backup Owner [Role]	Acts when the Privacy Owner is unavailable
System owners	Search their system for the requester's data by the date set in the case file
Everyone else	Forwards any request to the Privacy Owner on the same day it is received

4. How to submit a request

A request may be made in any form, by any channel, to any person at [Company]. That includes email, a support ticket, Slack, a social media message, or a phone call. Requesters may use the request form at the end of this document at [address or form link], but they do not have to. Anyone who receives a request must forward it to [Privacy Owner] at [address] on the same day.

5. Identity verification

Before releasing personal data, [Company] will take reasonable steps to confirm that the requester is the data subject. We will not request more than we need, and we will delete any identity document once it has served its purpose. Asking for extra information must not delay the response: ask once, ask for the minimum, and note the date you asked in the log.

Verification matrix

Requester	Lightest check that fits	Step up when
Logged-in account holder	Session plus confirmation sent to the email on file	The request is for a large export or a deletion
Email requester with no account	Reply to the address on file; ask one account-specific question	The answers do not match our records
Request for sensitive data, or from a third party	Stronger evidence plus written authority for any third party	Always
Authorized agent (California)	Signed permission from the consumer, and confirmation with the consumer directly	Always

6. Deadlines

The clock starts on the day any person at [Company] receives the request. We acknowledge requests within [two business days] and aim to respond within [21 days]. These internal targets are meant to keep us well inside the legal deadlines below.

	GDPR (Article 12)	CCPA (11 CCR 7021)
Trigger	Receipt of the request	Receipt of the request
Acknowledge	No fixed day count	Within 10 business days
Respond	Without undue delay, within one month	Within 45 calendar days
Extension	Up to two further months for complex or numerous requests	Up to 45 additional calendar days
Extension notice	Within the first month, with reasons	Notice to the consumer with the reason
Maximum	Three months in total	90 calendar days in total
Verification pauses the clock?	Not stated as a pause in the Article	No. The clock runs regardless of verification time

WATCH OUT

A request sent to a sales rep on Monday is a request received on Monday. The GDPR period is one month, not a fixed 30 days. Confirm other jurisdictions' deadlines with counsel, including the UK and other US states.

7. Fees and refusals

[Company] does not charge for responding to requests. Where a request is manifestly unfounded or excessive, we may charge a reasonable fee or decline to act, and we will document the reason. The burden of showing that a request is manifestly unfounded or excessive is ours. If we decline, we will tell the requester why within one month, and that they may complain to their supervisory authority and seek a judicial remedy. For California requests, confirm the current denial and fee rules with counsel before applying this section.

Situation	Refuse?	Charge?	Still send
Large first-time request	No	No	Full response, or an extension notice within the first month
Repeated, identical request	Possibly, if manifestly excessive	A reasonable fee, if so	Reasons, plus the complaint and judicial remedy sentence

Request made to cause disruption	Possibly, if manifestly unfounded	A reasonable fee, if so	Reasons, plus the complaint and judicial remedy sentence
Copy would expose other people's data	Not wholesale	No	The requester's own data, with others' data redacted

8. Search and redaction

We search the systems listed in the search and redaction checklist at the end of this document. We remove personal data about other people and any material we are entitled to withhold. A copy of the data must not adversely affect the rights and freedoms of others. We do not delete data to avoid answering a request, and a pending request freezes deletion of that person's data until the case is closed.

9. Response content

A complete response is a copy of the personal data plus the information the requester is entitled to alongside it. Send it in a commonly used electronic form unless the requester asks otherwise.

- The purposes of the processing and the categories of personal data
- The recipients or categories of recipient
- The storage period, or the criteria used to set it
- The right to request rectification or erasure
- The right to complain to a supervisory authority
- The source of the data, where it was not collected from the person
- The existence of automated decision-making, if any
- The safeguards that apply to any transfer to a third country

10. Records and review

- Log every request on receipt, using the log fields below
- Keep each case file for [24 months], then delete it on the retention date
- Run a test request [annually] and keep the record
- Review this policy at least [annually] and after any change in systems or any case that exposed a gap

Request log fields

Field	Why it matters
Case ID	One reference for every letter and file
Date received	Starts the clock
Channel	Shows whether intake works

Requester type	Customer, employee, applicant, other
Regime	GDPR, CCPA, or other
Verification status	Pending, confirmed, or declined
Extension	Yes or no, with the date notified
Systems searched	Evidence that the search was reasonable
Outcome	Fulfilled, partly fulfilled, refused
Date sent	Proves the deadline was met
Retention date	When the case file is deleted

Data subject request form

You do not have to use this form. A request in any written or spoken form is valid.

Your name: [] Email we should reply to: []

Your relationship to [Company]: customer / employee / applicant / other

What are you asking for: a copy of your data / a correction / deletion / something else

Anything that helps us find your data, such as a date range or a product name:

[]

Preferred format: []

FOR THE TEAM

Collect the minimum. Leave out government ID numbers, dates of birth you do not need, and any free-text field that invites medical or financial detail. A form can never be mandatory.

Response letters

Four letters cover almost every case. Each one shows the sentence that cannot be left out.

Letter	When it is sent	The sentence it must contain
Acknowledgment	Within your internal target, and no later than the legal one	The date you received the request and the date you will respond by
Extension	Within the first month under GDPR, or before the California 45 days runs out	The reason the extra time is needed
Refusal	Within one month under GDPR	The reasons, plus the right to complain and seek a judicial remedy
Fulfilment	When the response is ready	The data copy plus the Article 15 information

LETTER 1: ACKNOWLEDGMENT

Hello [Name], we received your request on [date]. We will respond by [date]. To protect your data, we may need to confirm your identity first, and we will tell you if we do. If you have questions in the meantime, reply to this email and quote case [ID].

LETTER 2: EXTENSION

Hello [Name], we received your request on [date] and need more time to respond because [reason, such as the number or complexity of requests]. We will respond by [new date]. We are sorry for the delay.

LETTER 3: REFUSAL

Hello [Name], we received your request on [date]. We are not able to act on it because [reasons]. You have the right to complain to your supervisory authority and to seek a judicial remedy. If you have questions, reply to this email and quote case [ID].

LETTER 4: FULFILMENT

Hello [Name], thank you for your request of [date]. Your personal data is attached in [format]. This letter also sets out the purposes of our processing, the categories of data, the recipients, how long we keep it, the source of the data, your rights to rectification and erasure, your right to complain to a supervisory authority, whether we use automated decision-making, and the safeguards for any transfer to a third country. Case reference: [ID].

Search and redaction checklist

Keep a copy in the case file. It doubles as evidence that your search was reasonable.

System	Owner	Date asked	Date answered	Data found?
Production database	[Name]			
Analytics and product tools	[Name]			
Support tool	[Name]			
CRM and marketing tools	[Name]			
Email and Slack	[Name]			
HR tools, including recruiting	[Name]			
Logs and backups	[Name]			
Vendors and sub-processors	[Name]			

Before you send

- Remove personal data about other people
- Check whether privileged material or trade secrets need to be withheld, with counsel
- Confirm the data has not been deleted since the request arrived

- Record the date sent and the retention date in the log

Evidence checklist

- Approved policy with version number and date
- Acknowledgment records from everyone in scope
- Training record for support, HR, and anyone who reads a shared inbox
- Test-request record
- Log export
- Closed-request sample with letters
- Privacy notice showing the request channel

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