Subject Access Request Procedure - Website

1. The Purpose

1.1 The purpose of this document is to communicate how Salterton deals with a Subject Access Request (SAR) to ensure we manage these consistently, lawfully, and within the statutory timeframes in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

2. Scope

2.1 This procedure applies to anyone whose personal data we store. This can include employees, contractors, clients and customers.

2.2 The procedure covers requests from individuals seeking access to their personal data held by the organisation.

3. What is a Subject Access Request

3.1 A Subject Access Request is a request made by an individual asking for confirmation that their personal data is being processed and requesting access to that personal data and related information.

4. How can I make a Request?

4.1 Requests may be made:

- In writing to 4 Cedar Court, Tiverton Business Park, Devon, United Kingdom, EX16 6GT
- By email to office@saltertonassociates.uk
- Through social media (LinkedIn - Salterton)
- Verbally
- Via a representative acting on behalf of the individual

4.2 You do not have to use the term "Subject Access Request" for the request to be valid. Please just tell us you would like access to personal data we hold about you.

4.3 We will need your name, how we can contact you and we will need to confirm your identity.

4.4 Before releasing personal data, Salterton must be satisfied regarding your identity. We will therefore ask you to provide suitable identification. Acceptable forms of identification may include:

- Passport
- Driving licence
- Utility bill

- Staff identification

If additional information is required to verify your identity, the statutory response period will begin once sufficient identification has been received.

4.5 Where large volumes of information are involved, Salterton may ask you to narrow the scope of your request. Examples include:

- Specific time periods
- Particular content
- Specific correspondence types

4.6 Salterton will then conduct searches of:

- Electronic systems
- Shared drives
- Email accounts
- HR records
- Customer records
- Financial systems
- Paper records where applicable

4.7 Salterton will review the information we hold to determine:

- Whether the information constitutes personal data
- Whether any exemptions apply
- Whether third-party data is included
- Whether redactions are necessary

4.8 Examples of exemptions may include:

- Legal professional privilege
- Management information relating to negotiations
- Confidential references (where applicable)
- Information relating to crime prevention or detection

4.9 When we have compiled all the data we hold for you we will prepare a response and then issue this to you. Our response will include the following;

- Confirmation of Processing
- Copy of Personal Data
- Any Supplementary Information Including:

- Purposes of processing
- Categories of personal data
- Recipients of data
- Retention periods
- Data source information (where applicable)
- Individual rights
- Right to complain to the Information Commissioner's Office (ICO)

4.9 When we issue our response to you, we will ensure it is securely sent, in an accessible format and electronical were requested and when appropriate.

Appropriate security measures may include:

- Encrypted email
- Secure file transfer
- Recorded delivery

5. Timescales

5.1 Salterton will respond to SARs without undue delay and within one calendar month of receipt.

5.2 The response period may be extended by up to two further months where:

- The request is complex; or
- Where you have made multiple requests

5.3 Where an extension is required, we will inform you within one month of receipt of the request.

6. Refusing a Request

6.1 Salterton may refuse a request where it is:

- Manifestly unfounded
- Manifestly excessive
- Where an exemption applies regarding information about other people related to your subject access request

6.2 Where we refuse a request it will be approved by our designated data protection officer, it will be documented and we will explain to your why we have refused your request.

6.3 If we refuse a request, you will have a right to complain to us directly and or, make a complaint about us to the Information Commissioners Office, and or, seek judicial remedy.

6.4 If you feel we have mishandled a subject access request you can complain to us directly. Our complaint procedure is stored in the policy section of our website.