



UNIVERSITY OF  
PLYMOUTH

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# SUBJECT ACCESS REQUEST PROCEDURE

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## Subject Access Request Procedure

### Document Control

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0.1	Mike Godfrey	GDPR Consultant	1 <sup>st</sup> Draft	10/08/2018			
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1.0	Mike Godfrey	GDPR Consultant	Major version published	05/09/2018	Information Governance Committee		13/09/2018

# Subject Access Request Procedure

## 1. Purpose

This procedure document supplements the subject access request (SAR) provisions set out in **University of Plymouth** Data Protection Policy & Procedures and provides the process for individuals to use when making an access request, along with the protocols followed by the University of Plymouth when such a request is received.

## 2. The Right of Access

Under Article 15 of the GDPR, an individual has the right to obtain from the controller, confirmation as to whether personal data concerning them is being processed. We are committed to upholding the rights of individuals and have dedicated processes in place for providing access to personal information. Where requested, we will provide the following information: -

- the purposes of the processing
- the categories of personal data concerned
- the recipient(s) or categories of recipient(s) to whom the personal data have been or will be disclosed
- If the data has been transferred to a third country or international organisation(s) (*and if applicable, the appropriate safeguards used*)
- the envisaged period for which the personal data will be stored (*or the criteria used to determine that period*)
- where the personal data was not collected directly from the individual, any available information as to its source

### 1. What is a Subject Access Request (SAR) and how to make one?

A subject access request (SAR) is a request for access to the personal information that the University of Plymouth holds about the data subject, which we are required to provide under the GDPR (*unless an exemption applies*). The information that we provide is covered in section 3 of this document.

You can make this request in writing using the details provided in section titled '*Submission & Lodging a Complaint*', or you can submit your access request electronically to [dpo@plymouth.ac.uk](mailto:dpo@plymouth.ac.uk). Where a request is received by electronic means, we will provide the requested information in a commonly used electronic form (*unless otherwise requested by the data subject*).

## What We Do When We Receive An Access Request

### Identity Verification

Subject Access Requests (SAR) are passed to the Data Protection Officer (DPO) or their nominated deputy as soon as received and a record of the request is made. The person in charge will use all reasonable measures to verify the identity of the individual making the access request, especially where the request is made using online services.

We will utilise the request information to ensure that we can verify your identity and where we are unable to do so, we may contact you for further information, or ask you to provide evidence of your identity prior to actioning any request. This is to protect your information and rights.

If a third party, relative or representative is requesting the information on your behalf, we will verify their authority to act for you and again, may contact you to confirm their identity and gain your authorisation prior to actioning the any request.

# Subject Access Request Procedure

## Information Gathering

If you have provided enough information in your SAR to collate the personal information held about you, we will gather all documents relating to you and ensure that the information required is provided in an acceptable format. If we do not have enough information to locate your records, we may contact you for further details. This will be done as soon as possible and within the timeframes set out below.

## Information Provision

Once we have collated all the personal information held about you, we will send this to you in writing (*or in a commonly used electronic form if requested*). The information will be in a concise, transparent, intelligible and easily accessible format, using clear and plain language.

## Fees and Timeframes

We aim to complete all access requests within 1 month (starting from the day after the SAR is received) and provide the information free of charge.

Whilst we provide the information requested without a fee, further copies requested by the individual may incur a charge to cover our administrative costs.

The University of Plymouth will always aim to provide the requested information at the earliest convenience, but at a maximum, 1 calendar month from the day after the date the request is received. However, where the retrieval or provision of information is particularly complex or is subject to a valid delay, the period may be extended by two further months. If this is the case, we will write to you within 1 calendar month and keep you informed of the delay and provide the reasons.

## Your Other Rights

Under the GDPR, you have the right to request rectification of any inaccurate data held by us. Where we are notified of inaccurate data, and agree that the data is incorrect, we will amend the details immediately as directed by you and make a note on the system (*or record*) of the change and reason(s). We will rectify any errors within 30-days and inform you in writing of the correction and where applicable, provide the details of any third-party to whom the data has been disclosed.

If for any reason, we are unable to act in response to a request for rectification and/or data completion, we will always provide a written explanation to you and inform you of your right to complain to the ICO and to seek a judicial remedy.

In certain circumstances, you may also have the right to request from the University of Plymouth, the erasure of personal data or to restrict the processing of personal data where it concerns your personal information; as well as the right to object to such processing. You can use the contact details in section 7 to make such requests.

## Exemptions and Refusals

The GDPR contains certain exemptions from the provision of personal information. If one or more of these exemptions applies to your subject access request or where the University of Plymouth does not act upon the request, we shall inform you at the earliest convenience, or at the latest, within one month of receipt of the request.

## Subject Access Request Procedure

Where possible, we will provide you with the reasons for not acting and any possibility of lodging a complaint with the Supervisory Authority and your right to seek a judicial remedy. Details of how to contact the Supervisory Authority are laid out in section 7 of this document.

## Submission & Lodging a Complaint

To submit your SAR, you can contact us at [dpo@plymouth.ac.uk](mailto:dpo@plymouth.ac.uk) or visit our Subject Access Request page on our website. You can also submit your request in writing using the **form in Appendix 1**, sending the request to: -

Data Protection Officer  
University of Plymouth University  
Drake Circus  
Plymouth PL4 8AA  
United Kingdom  
**+44 (0)1752 600500**

If you are unsatisfied with our actions or wish to make an internal complaint, you can contact us in writing at: -

Data Protection Officer  
University of Plymouth University  
Drake Circus  
Plymouth PL4 8AA  
United Kingdom  
[dpo@plymouth.ac.uk](mailto:dpo@plymouth.ac.uk)

**Please see the GDPR Complaints Policy for further information on making a complaint regarding the use of your personal data.**

## Supervisory Authority

If you remain dissatisfied with our actions, you have the right to lodge a complaint with the Supervisory Authority.

***The Information Commissioner's Office (ICO) can be contacted at: -***

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF  
Telephone: 0303 123 1113 (*local rate*) or 01625 545 745 (*national rate*)  
Fax: 01625 524 510  
Email: [enquiries@ico.org.uk](mailto:enquiries@ico.org.uk)

## Subject Access Request Form

Under the General Data Protection Regulation, you are entitled as a data subject to obtain from the University of Plymouth, confirmation as to whether we are processing your personal data, as well as to request details about the purposes, categories and disclosure of such data.

You can use this form to request information about, and access to any personal data we hold about you. Details on where to return the completed form can be found at the end of the document.

### 1. Personal Details:

<b>Data Subject's Name:</b>		<b>DOB:</b>	___ / ___ / _____
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<b>Home Telephone No:</b>		<b>Email:</b>	
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**Data Subject's Address:**

**Any other information that may help us to locate your personal data:**

### 2. Specific Details of the Information Requested:

### 3. Representatives *(only complete if you are acting as the representative for a data subject)*

**[Please Note: We may still need to contact the data subject where proof of authorisation or identity are required]**

<b>Representative's Name:</b>		<b>Relationship to Data Subject:</b>	
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<b>Telephone No:</b>		<b>Email:</b>	
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**Representative's Address:**

**I confirm that I am the Data Subject or the authorised representative of the named data subject:**

**Name:** \_\_\_\_\_ **Signature:** \_\_\_\_\_

***For postal requests, please return this form to:***

Data Protection Officer  
University of Plymouth University  
Drake Circus  
Plymouth PL4 8AA  
United kingdom