

Risk Assurance Management Ltd Subject Access Request Policy

Revision 1
May 2018

Contents

Overview	3
Definitions	3
How can you make a request?	3
How quickly will we respond to your Subject Access Request?	3
Can we charge a fee?	3
What information will we send to you?	4
Can we refuse your request for information?	4

Overview

Individuals have a right, under the General Data Protection Regulations, to access the personal data we hold on them. To do so, you should make a Subject Access Request (SAR), and this policy sets out how you can make a request, and our actions upon receiving this request.

Definitions

“Personal data” is any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier, including your name.

How can you make a request?

If you wish to make a request, then you should complete a Subject Access Request Form (available from our website).

Requests that are made directly by yourself should be accompanied by evidence of your identity, such as a copy of a valid passport or photo driving licence. If this is not provided, we will contact you to ask that such evidence be forwarded before we comply with the request.

Requests made in relation to data from a third party should be accompanied by evidence that the third party is able to act on your behalf. Evidence requested may include but is not limited to a Letter of Authority or a copy of a Power of Attorney. If this is not provided, we will contact the third party to ask that such evidence.

How quickly will we respond to your Subject Access Request?

Usually, we will comply with your request without delay and at the latest within one month of receipt of your completed form along with any additional evidence we have requested.

Where requests are complex or numerous, we may contact you to inform you that an extension of time is required. The maximum extension period is two months.

Can we charge a fee?

We will normally comply with requests at no cost. However, if the request is manifestly unfounded or excessive, or if it is repetitive, we may contact you requesting a fee. This fee must be paid before we can comply with your request. The fee will be determined at the relevant time and will be set at a level which is reasonable in the circumstances and based on the time taken and costs of providing the information.

In addition, we may also charge a reasonable fee if you request further copies of the same information.

What information will we send to you?

When responding to a SAR, we will inform you of the following:

- Whether or not your data is processed and the reasons for the processing of your data;
- The categories of personal data we process concerning you;
- Where your data has been collected from if it was not collected from you;
- Anyone who your personal data has been disclosed to or will be disclosed to;
- How long your data is kept for;
- Your rights in relation to data rectification & erasure;
- Your right to complain to the Information Commissioner if you are of the opinion that your rights have been infringed;

Can we refuse your request for information?

We may refuse to deal with your SAR if it is manifestly unfounded or excessive, or if it is repetitive. Where it is our decision to refuse your request, we will contact you without undue delay and at the latest within one month of receipt of your request to inform you of this and to provide an explanation and inform you of your right to complain to the Information Commissioner and provide you with the relevant contact details to do so.

We can also refuse to deal with your request, or part of a request, in relation to medical information as the Data Protection (Subject Access Modification) (Health) Order 2000 requires that we obtain the GP's consent before health records we have received for a third party are made available to you. As such if you have requested a copy of any of the medical information we process on you we will send the applicable information to your GP and advise you to either make an appointment to see your GP to discuss the information or you may wish to request a copy of this information from your GP who will decide whether to release the information.