

# Data Subject Access Request Policy

**Littlehampton Bonfire  
Society Limited**

## **Document Control**

Reference: Littlehampton Bonfire Society Ltd 03379689 Data Subject Access Request Policy.

Issue No: 01/BB

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## **Data Subject Access Request Policy**

### **1. Introduction**

All members of the Littlehampton Bonfire Society shall have the right to access their personal data and supplementary information, by means of a formal written request. The access ensures that all members can be assured that their information being held by Littlehampton Bonfire Society is held lawfully and in accordance with the Societies GDPR Policy of processing information. Littlehampton Bonfire Society must comply with the requirements of the General Data Protection Regulations Act 2018. The Society must be able to demonstrate compliance to the Information Commissioner's Office (ICO).

Upon receipt of a formal request for information our Society's internal policy is as follows:

### **Responsibility**

1.1. The Society Data Controllers are responsible for the management of dealing with Subject Access Requests from Littlehampton Bonfire Society members. This Policy relates to requesting personal details held on the Societies system. The duties of the Societies Data Controllers include but are not limited to:

- Log the receipt of email/letter or other request received from the Society member, making such a request to see his or her personal information
- Log information that such he or she formally requests
- Acknowledge the Subject Access Request (SAR) via email or letter

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- Maintain a database on the volume of requests and compliance against the Societies statutory timescale of thirty working days in line with GDPR Policy
- The Society Data Controller will verify if we are the relevant controller of the members personal data.
- Where applicable, decide if a request is excessive, unfounded or repetitive and communicate this to the member within thirty working days stating the reason for declining such a request.
- If a SAR comes in an electronic form, any information should be preferably be provided by electronic means as well.
- Decide if an exemption applies:  
If a member makes a request in paper format due to not being able to communicate electronically, then replies will be in the same format.

## **Oral or Written Request**

- 1.2. Subject access requests can be made in writing, or electronically.
- 1.3. If any Director, Officer or Committee member receives a Subject Access Request they are to direct this to the Society's designated Society Data Controllers.
- 1.4. If any other member receives a Subject Access Request, they must also refer this communication onto the Society Data Controller.

## **How do we verify the requestor's identity?**

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- 1.5. The Society's Data Controller will verify that a member is a fully paid up member and can be proofed by means of checking the memberships secretary's database.

### **How to process the request**

- 1.6. The aim of the Society is to determine what information the member is asking for. If the request is not clear, or where if we process a large quantity of information about an individual, the GDPR permits us to ask the individual to specify the required information and the request of what the information relates to. This only applies to requests of personal information held and where necessary we will ask for further information.
- 1.7. If the member asks for information that the Society does not hold, the Society Data Controller must inform the member that the Society does not hold the relevant information requested within thirty working days.
- 1.8. Under GDPR regulations the Society must reply to any Data Subject Access Requests within thirty working days.
- 1.9. All the information that has been requested must be provided unless an exemption can be applied. Information must be supplied in an intelligible form and the Society will explain acronyms, codes or complex terms.

### **No change to comply with the request (with exceptions)**

2. Regarding a request if approved the Society will provide information free of charge in line with GDPR regulations.

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### **Excessive, manifestly unfounded or repetitive requests**

2.1 Where personal data requests are deemed by the Directors or Committee to be manifestly, unfounded, excessive or repetitive. The Society reserves the right to refuse to act on such a request.

### **Complex requests**

2.2 As stated within this Society Policy. The Society is required to respond to Subject Access Requests within thirty working days. If the Directors or Committee feel more time is required to reply with a suitable response to what is considered more complex requests, an extension of another two months is permissible. This is provided the Society write to the member via letter or email with thirty working days advising them of the extension period.

2.3 Where the Society decide to not take any further action with a member's request, the Society will be required to inform the member of this decision without delay and at the latest within thirty working days of receipt of the request.

### **Complaints**

2.4 Where a member is not satisfied with the Societies response to a Subject Access Request, the Society should manage this in line with the Societies complaints procedure. In the event a member is not satisfied with the Societies final decision, then the member must be made aware they may make a complaint with the Information Commissioners Office.

### **Breaches of this policy**

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2.5 Breaches of this policy by any Director or member will be formally investigated and may result in termination of Society membership and possible legal action.

### ***Document Owner and Approval***

The [Littlehampton Bonfire Society Ltd] is the owner of this document and is responsible for ensuring that this policy document is reviewed in line with the review requirements stated above.

A current version of this document is available to all members on request via paper or electronic copy.

This policy was approved by the [Board of Directors and Committee] on [21/12/2020] and is issued on a version-controlled basis under the signature of the Director: Barry Bastable of Littlehampton Bonfire Society Ltd.

Signature: B.Bastable

Date:22/12/2020

### **Change History Record**

Issue	Description of Change	Date of Issue	Date to be reviewed
1	Initial issue	22/12/2020	December 2023

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