JOIC FACT SHEET

06 Guidance for Organisations

Recognising a request for personal information

Open dialogue & communication between requestor & you

Is this a business as usual request? e.g request for bank statement

YES → Process as normal

NO → Under the Data Protection (J) Law is this a subject access request?

Be aware the request can take any format & not mention 'subject access request' or the law

Refer to your DP Policy & SAR Guide

- Note date of request
- Note date of latest response to comply [4 weeks]
- Send an acknowledgment
- Do you need to verify requestors identity?
- Consider if you need requestor to clarify or refine request [NB they don't have to]

In the rare event that you may not do this in the 4 weeks you must advise the requestor without delay & before the deadline

Do you hold the requestor's information?

YES

NO → advise them accordingly

- Search by all name variations ie Mr B Smith, B Smith, Smith B, Bert Smith, Albert Smith etc.
- Catalogue & collate all relevant personal information; this could include CCTV footage, audio recordings, social media, opinions, staff records, supplier & customer records
- Do any of these contain anyone else's' personal data?
  - a. Extract
  - b. Consent
  - c. Redact
  - d. Exemption...must identify and specify to requestor why exemption applies.
- You must supply information in a format
  - a. Appropriate to the requestor
  - b. Easy to understand
- You should consider
  - c. A 'legend' for special terms/abbreviations
  - d. Consider the format
  - e. Security of response
- You must also advise requestor of all their information rights & right of appeal

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