

# SUBJECT ACCESS REQUEST PROCEDURE

## Document Control

Reference: Subject access  
request procedure DSP DOC  
01-1.3.4a  
Issue No: 2  
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## 1. Scope

All personal data processed by Saving Faces is within the scope of this procedure.

Data subjects are entitled to obtain:

- Confirmation as to whether Saving Faces is processing any personal data about that individual;
- Access to their personal data;
- Any related information.

## 2. Responsibilities

- 2.1 The Data Protection Officer is responsible for the application and effective working of this procedure, and for reporting to the information owner and Office Manager on data subject access requests (SARs).
- 2.2 The Data Protection Officer is responsible for handling all SARs.

## 3. Procedure

- 3.1 SARs are made using the Subject Access Request Form.
- 3.2 The data subject provides Saving Faces with evidence of their identity, in the form of a current passport/driving license, and the signature on the identity must be cross-checked to that on the application form. Additional evidence of identity may be requested.
- 3.3 The data subject identifies the specific set of data held by Saving Faces on their subject access request. The data subject can request all data held on them.
- 3.4 Saving Faces records the date that the identification checks were conducted and the specification of the data sought.
- 3.5 Saving Faces provides the requested information to the data subject within 20 days from this recorded date.
- 3.6 Once received, the SAR application is immediately forwarded to the Data Protection Officer who will ensure that the requested data is collected within the specified time frame in clause 3.5 above.  
Collection entails:
  - 3.6.1 Collecting the data specified by the data subject; or
  - 3.6.2 Searching all databases and all relevant filing systems (hard copy files) in Saving Faces, including all back up and archived files (electronic or hard copy) and all email folders and archives.
- 3.7 The Data Protection Officer maintains a record of requests for data and of its receipt, including dates, in a locked cupboard in the Officer Manager's office.
- 3.8 The Data Protection Officer reviews all documents that have been provided to identify whether any third parties are present in it, and either removes the identifying third-party information from the documentation or obtains written consent from the third party for their identity to be revealed.

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- 3.9 If any of the requested data is being held or processed under one of the following exemptions, it does not have to be provided:
- Crime and taxation
  - Health
  - Regulatory activity
  - Journalism, literature and art
  - Research history, and statistics
  - Publicly available information
  - Corporate finance
  - Confidential references
  - Management forecasts
  - Negotiations
  - Legal advice and proceedings
  - Self-incrimination
- 3.10 In the event that a data subject requests Saving Faces to provide them with personal data, then Saving Faces will provide the requested information in electronic format, unless otherwise specified. All of the items provided to the data subject are listed in a record that shows the data subject's name and the date on which the information is delivered to the data subject.
- 3.11 In the event that a data subject requests what personal data is being processed, then Saving Faces provides the data subject with the following information:
- 3.11.1 Purpose(s) of the processing.
  - 3.11.2 Categories of personal data.
  - 3.11.3 Recipient(s) of the information, including recipients in third countries or international organisations.
  - 3.11.4 How long the personal data will be stored.
  - 3.11.5 The data subject's right to request rectification or erasure, restriction or objection, relative to their personal data being processed.
- 3.12 Saving Faces removes personal data from systems and processing operations as soon as a request for erasure has been submitted by the data subject.
- 3.13 Saving Faces contacts and communicates with other organisations, where the personal data of the data subject is being processed, to cease processing information at the request of the data subject.
- 3.14 Saving Faces takes appropriate measures without undue delay in the event that the data subject has: withdrawn consent; objects to the processing of their personal data in whole or part; no longer under legal obligation and/or has been unlawfully processed.
- 3.14.1 Information on the source of the personal data if it has not been collected from the data subject.
  - 3.14.2 If and where personal data has been transferred and information on any safeguards in place.

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## 4. Document Owner and Approval

The Data Protection Officer is the owner of this document and is responsible for ensuring that this procedure is reviewed in line with data protection law.

A current version of this document is available to all members of staff on the Saving Faces website.

This procedure was approved by the Chief Executive Officer (CEO) and is issued on a version controlled basis under their signature.

<b>Name</b>	Iain Hutchison
<b>Signature</b>	
<b>Approval Date</b>	03/04/2024
<b>Review Date</b>	03/04/2025

## Change History Record

Issue	Description of Change	Approval	Date of Issue
1	Initial issue	CEO	23/06/2021
2	Review	SM	23/06/2022
2	Reviewed - no changes	Hannah John and Ping San	13.02.2024