

Porthcawl Town Council



Subject Access Request Policy

1. Scope

All personal data processed by Porthcawl Town Council is within the scope of this procedure. This procedure excludes personal data that is asked for as a matter of routine by data subjects.

2. Responsibilities

The Town Council are responsible for dealing with Subject Access Requests, with support from the Town Clerk.

3. Procedure

- 3.1 Subject Access Requests (SARs) must be made verbally or in writing to the Town Council Office staff.
- 3.2 Upon receipt of a SAR we will
 - verify if we are the controller of the data subject's personal data. If we are not the controller, but merely the processor, we will inform the data subject and refer them to the actual controller.
 - Verify the identity of the data subject, if needed, request any further evidence on the identity of the data subject.
 - Confirm what data is requested.
 - Verify whether we process the data requested. If we do not process the data we will inform the data subject accordingly.
 - Ensure data will not be changed as a result of the SAR. Routine changes as part of the processing activities concerned are permitted.
 - Verify whether the data requested also involves data on other data subjects and make sure this data is filtered before the requested data is supplied to the data subject. If data cannot be filtered ensure that other data subjects have consented to the supply of their data as part of the SAR.

4. Response to a SAR

Porthcawl Town Council will respond to a SAR within one month after receipt of the request.

- If more time is needed to respond to complex requests, an extension of another two months may be allowed for provided we directly communicate this to the data subject within the first month.

- If we cannot provide the information requested we will inform the data subject on this decision without delay and at the latest within one month of receipt of the request.

5. What information will the Town Council provide?

If data on the data subject is processed, we will include the following information in our response:

- The purpose of the processing
- The categories of personal data concerned
- The recipients or categories of recipients to whom personal data has been or will be disclosed, in particular in third countries or international organisations, including any appropriate safeguards for transfer of data, such as Binding Corporate Rules or EU model clauses.
- Where possible, the envisage period for which personal data will be store, or if not possible, the criteria used to determine that period
- The existence of the right to request rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing,
- The right to lodge a complaint with the Information Commissioners Office ("ICO")
- If the data has not been collected from the data subject, the source of such data,
- The existence of any automated decision-making, including profiling and any meaningful information about the logic involved, as well as the significant and the envisaged consequences of such processing for the data subject.
- Provide a copy of the personal data undergoing processing.