



Subject Access Request Policy

March 2024

Owner: Chartered Legal Executive & Data Protection Officer

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5.0	Compliance update following internal audit	11/03/2024	Head of Risk & Compliance	June 2025
4.0	Compliance check	10/06/2022	HoST	
3.0	Health Check	April 2020	HOST	April 2023
2.0	Health Check	Dec 2018	HOST	April 2019
1.0	New Policy	17/05/2018	Group Audit & Risk Committee	

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1. What is this policy for?

- 1.1 This policy details what will happen and how we will respond to a Subject Access Request ('SAR') under the UK General Data Protection Regulation (the GDPR).

2 What is the GDPR and a Subject Access Request?

- 2.1 The GDPR sets out how organisations must handle personal data. Article 15 of the GDPR gives individuals the right to be told what information is holding about them and, to receive a copy of that information upon request unless an exemption applies.

3 What is our General Policy?

- 3.1 We are committed to complying with individual's requests for information made under the GDPR and we will respond to all reasonable requests for information that are not subject to specific exemptions as set out in the GDPR or the Data Protection Act 2018 ('DPA').

4 How can you make a Subject Access Request?

- 4.1 A subject access request must be made in writing (this includes e-mails, social media, and text messaging). If a request is made in person or over the phone, the individual will be asked to put it in writing. The written request can be made on behalf of the individual by a named advocate or person acting on their behalf with the individual's consent.
- 4.2 When a request is received, we will invite individuals (or their advocate / named person) to complete our Subject Access Request form, which is available on our website. Completing this form is not compulsory but will ensure we have all the information we require to respond to the request efficiently. If you are unable to access the online form, we will make sure our Subject Access Request Form is sent out to you in your preferred way for you to complete and return to our Data Protection Officer either electronically via e-mail or to the address detailed below.
- 4.3 We do not have to respond to a request made in person or over the phone, however we will not ignore these requests and will explain to individuals that requests need to be made in writing.

5 How and where to send your Subject Access Request.

- 5.1 A Subject Access Request can be received in any area of the Ongo Group by any member of staff but will always be passed to our Data Protection Officer.
- 5.2 To send a request directly to the Data Protection Officer, the postal or e-mail address below should be used:

- Ongo Partnership Ltd. Ongo House, High Street, Scunthorpe, North Lincolnshire, DN15 6AT;
- DataProtectionTeam@ongo.co.uk.

5.3 Individuals may make Subject Access Requests through text or via social media (e.g. Facebook or Twitter) or the live web-chat facility on our website – www.ongo.co.uk.

5.4 We will process your subject access request in accordance with the GDPR and the DPA and provide you with a response within 28 days of receipt of all the relevant information detailed above.

6 Can we charge a fee for responding to a Subject Access Request?

6.1 Under the GDPR, we cannot charge a fee for standard subject access requests.

6.2 However, the GDPR does allow us to charge a ‘reasonable fee’ where a request is unfounded or excessive. This will usually mean that the request is repetitive.

6.3 We are also entitled to charge a reasonable fee to comply with any requests you make for further copies of the same information. Any fee charged for the additional copies of information will be based on the administrative costs of providing you with the information.

7 What is the timeframe for responding to Subject Access Requests?

7.1 We have one month to respond to your subject access request. This timeframe will begin from the date we receive all the information necessary to verify your identity. There are certain circumstances where we can extend this timeframe. We will notify you if it is necessary for the timeframe to be extended.

8 Are there any circumstances where we can refuse to respond to a Subject Access Request?

8.1 Unfounded or Excessive Requests

8.1.1 We can refuse to respond to your subject access request if we believe that your request is manifestly unfounded or excessive. If we do refuse to respond to your request on this basis, we will explain to you the reasons why we will not deal with your request and provide you with information about your right to complain to the Information Commissioner’s Office (‘ICO’) about our handling of your request.

8.2 Exemptions

8.2.1 The DPA contains certain exemptions to the right to access personal information. Examples of possible exemptions include information that is covered by legal

profession privilege, information that would prejudice the prevention or detection of a crime or confidential references we have provided.

9 What if there is an error in your Personal Information?

- 9.1 If you notice an error in the personal information we have provided to you in response to your subject access request, please contact the Data Protection Officer (01724 279900) and ask us to rectify the error. We will review your request to rectify the information. If we agree that the information is inaccurate, we will rectify the error and erase the inaccurate information if possible.

10 What if you want us to stop processing your Personal Information?

- 10.1 Under Article 21 of the GDPR, you have the right to object to us processing your personal information all together in certain circumstances. If you want to exercise your right to object to us processing your personal information, please contact us and we will consider whether or not we can comply with your request.

11 What if you are unhappy with our response to your Subject Access Request?

- 11.1 If you are unhappy with our response to your subject access request, you may ask us to conduct an internal review of our decision to respond to you in that way. If you do wish to make a complaint to us about the way in which we have responded to your subject access request and request an internal review, please contact us.

- 11.2 If you still dissatisfied following our internal review, you can complain to the Information Commissioner using the details below:

Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

0303 123 1113 (local rate) or 01625 545 745

You can also go to the ICO Website and use their [Live Chat Service](#).

- 11.3 Please note you are able to make a complaint to the Information Commissioner's Office without first going through our internal procedure.