



SUBJECT ACCESS REQUEST (SAR's) POLICY

1. POLICY STATEMENT

1.1 Holdan Ltd is committed to ensuring that any **personal data** and **sensitive personal data** that it holds about individuals (**Data Subjects**) is accurate, current, used only for the purpose intended and securely protected.

2. WHAT INFORMATION IS AN INDIVIDUAL ENTITLED TO UNDER THE GDPR?

2.1 Under the GDPR, individuals will have the right to obtain:

- confirmation that their data is being processed;
- access to their personal data; and
- other supplementary information (as set out in Article 15 of the GDPR).

3. WHAT IS THE PURPOSE OF THE RIGHT OF ACCESS UNDER THE GDPR?

3.1 The GDPR clarifies that the reason for allowing individuals to access their personal data is so that they are aware of, and can verify, the lawfulness of the processing (Recital 63).

4. FEES

4.1 A copy of the requested information will be provided **free of charge**. However, we may charge a 'reasonable fee' when a request is manifestly unfounded or excessive, particularly if it is repetitive.

4.2 We may also charge a reasonable fee to comply with requests for further copies of the same information. This does not mean that we may charge for all subsequent access requests.

4.3 Our fee will be based on the administrative cost of providing the information to you.

5. TIMESCALES

5.1 We will provide the requested information without delay and at the latest within 30 days of receipt.

5.2 We will be able to extend the period of compliance by a further two months where requests are complex or numerous. If this is the case, we will inform you within one month of the receipt of the request and explain why the extension is necessary.

6. WHAT IF THE REQUEST IS MANIFESTLY UNFOUNDED?

6.1 Where requests are manifestly unfounded or excessive, in particular because they are repetitive, we will:

- charge a reasonable fee taking into account the administrative costs of providing the information; or
- refuse to respond.

6.2 Where we refuse to respond to a request, we will explain why and inform you of your right to complain to the supervisory authority and to a judicial remedy without undue delay and, at the latest, within one month.

7. HOW SHOULD THE INFORMATION BE PROVIDED TO HOLDAN?

7.1 We need to verify the identity of the person making the request, using 'reasonable means'. Whilst there is no set format for making requests, we have created a template which will speed up the process. This can be found at **Appendix 1**.

7.2 Where requests are made electronically, we will provide the requested information to you in a commonly used electronic format like a PDF.

8. REQUESTS FOR LARGE AMOUNTS OF DATA

8.1 The GDPR permits us to ask you to specify the information the request relates to (Recital 63).

8.2 The GDPR does not include an exemption for requests that relate to large amounts of data, but we may be able to consider whether the request is manifestly unfounded or excessive.

Policy Approved by:



Allan Leonhardsen
Managing Director

Date: 02.05.2018



APPENDIX 1 – SUBJECT ACCESS REQUEST (SAR) FORM

Holdan Ltd is registered as a Data Controller under the

General Data Protection Regulations (GDPR)

Part 1 – Data Subject

Please write in **BLACK** in **BLOCK CAPITAL LETTERS**.

- I am the Data Subject (the person this information is about); or
- I am acting on behalf of the Data Subject.

If you are seeking information on behalf of someone who is unable to act for themselves, you must explain your relationship, what information you require and why. Please be aware that information relating to someone else will not be disclosed without the data subject's written consent or an appropriate court order or Power of Attorney.

Accordingly, I enclose:

- The Data Subject's written consent to disclosure of the information requested in Part 3:
- A Court Order (e.g. Power of Attorney) permitting the release of the information requested in Part 3:

My relationship to the data subject is (please specify):

Part 2 – Data Subject Personal Details

Surname:		Forename(s):		Title:	
----------	--	--------------	--	--------	--

Date of Birth:		National Insurance Number:		
Contact Tel. No:		E-mail Address:		

Please provide the address that you want the information sent to and include your daytime telephone number (if different from above, should we need to speak to you to discuss your request). If seeking information on behalf of someone else, please provide your full name and contact details below.

Surname:		Forename(s):		Title:	
Address Line 1:		Address Line 2:		Address Line 3:	
Town:		County:		Postcode:	
Country:		Daytime Tel. No:		Evening Tel. No:	

Part 3 – Declaration by Requestor

Verification of identity is required before your request can be processed:

2 forms of identification are required before we release any personal data, 1 of which must contain your photo.

I enclose as verification of identity photocopies of my:

- Passport
- Driving Licence
- Utility Bill
- Other

Part 4 – Information Requested

Please state clearly the information you require. Please provide as much relevant information as possible (names, dates etc.) as this will aid us in locating your data. *Holdan will process the information you have provided to locate the data sought. Your request will be processed in accordance with the General Data Protection Regulations (GDPR).*

Part 5 – Where to Send

Send completed forms to: FAO GDPR, Holdan Limited | Brookfield House | Brookfield Industrial Estate | Peakdale Road | Glossop | Derbyshire | SK136LQ | United Kingdom.