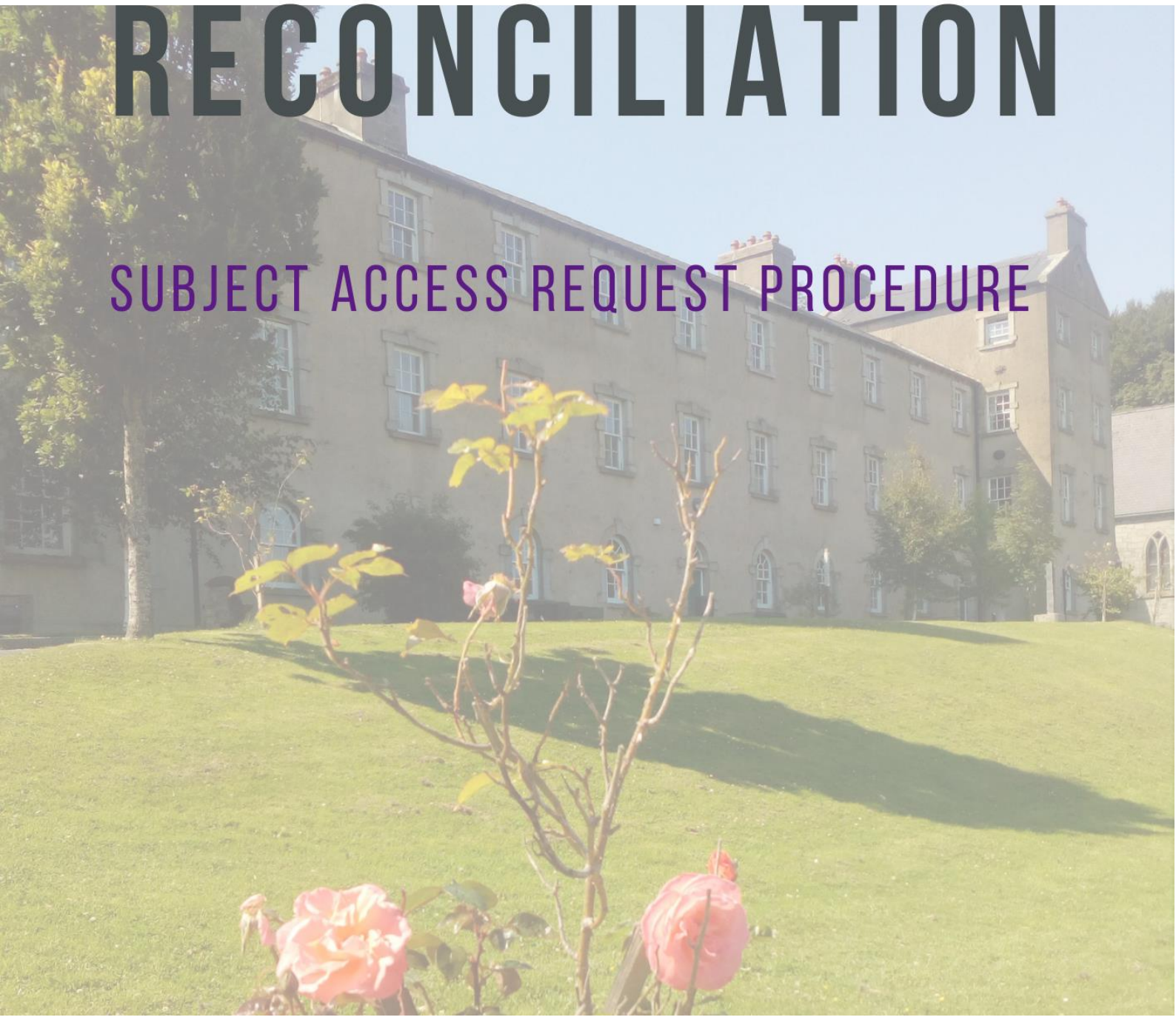


GLENCREE CENTRE FOR PEACE & RECONCILIATION

SUBJECT ACCESS REQUEST PROCEDURE



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1. Purpose and Scope

The purpose of this procedure is to outline a process for the management of data subject access requests by The Glencree Centre for Peace and Reconciliation (Glencree), the Data Controller. It also provides a process to be followed by the data subject (the individual) when submitting a subject access (SAR) request using the Glencree SAR form. A subject access request (SAR) enables a data subject to gain access to any personal data held about them in electronic or hardcopy form, within one month and free of charge. SAR applies to all forms of personal data including digital, physical and CCTV records which is being processed by Glencree, the Data Controller.

2. Legislation/Regulation

This procedure ensures Glencree meets its legal obligations under the General Data Protection Regulations Regulation (EU) 2016/679) in relation to the rights of the individual in relation to personal data held by Glencree (Article 15).

When an individual provides personal data to Glencree the individual has certain rights available in relation to their data. These individual rights are outlined below and can be exercised by the individual contacting Glencree, indicating which right(s) they wish to exercise. This procedure specifically addresses the 'right to be informed and the right of access' under subject access rights in the legislation.

3. Roles and Responsibilities

The Corporate Services Executive (CSE) will assume the role of Data Protection Officer (DPO) and act as a contact point for the individual. Any data requests received by members of staff or Board Members should be promptly referred to the CSE, which is the most efficient way for an individual to have their request responded to promptly. The CSE, as DPO, will engage with the individual to seek to clarify the request and request proof of identity.

When the nature of the data is sufficiently clear to act upon, the CSE will co-ordinate the targeted retrieval of personal data with the relevant Glencree staff where it is likely that the location of personal data will be under drives/folders/emails only accessible by authorised staff. The CSE will manage the SAR to ensure data is provided to the individual, in an intelligible form within one month.

Any SAR will be fully documented by the CSE and include in the annual GDPR Compliance Report for review by the GCPR Board.

4. Information an Individual is Entitled to Under a SAR

An individual can make an access request to Glencree where they think the organisation might be processing their personal data. Individuals should be sufficiently clear about what information they are seeking and be able to confirm proof of identity.

Individuals are entitled to **confirmation** of whether the controller is processing any of their personal data, which means any information which concerns or relates to them.

They are also entitled to a **copy** of their personal data in electronic or hardcopy as preferred by the individual.

In addition to the above, individuals are entitled to the following information:

- the categories of personal data processed
- the purposes of the processing
- information about where the data was sourced
- who the personal data are shared with
- how long the personal data will be stored
- the existence of automated decision-making (such as 'profiling')
- the safeguards in place if the personal data is transferred to a third country or international organisation
- the existence of various individual rights (access, rectification, objection)
- the right to lodge a complaint with the DPC

5. Making a Subject Access Request

An individual will be invited to complete the attached SAR form to aid Glencree to promptly assess the nature of the request and ascertain if further information is required. This is not a mandatory form, and an individual may make a verbal request.

6. Responding to a Subject Access Request

To provide clarity on the data request Glencree will kindly request that the individual completes a SAR form and will be provided with an electronic version of this procedure. However, should an individual decline to provide a written request Glencree must document the verbal request and ensure there is a common understanding on the scope of the request. Glencree will progress to responding to the request as normal.

Proof of the individual's identity will only be requested by the CSE where it is reasonable and proportionate.

Glencree may request that the individual clarifies the request as soon as possible, by specifying the information or processing activities which they want access to or information on. This will only be done where reasonably necessary to clarify a request (large quantity of information), and not to delay the response. If the individual refuses to clarify the request, Glencree must comply with the original request.

The **one month deadline** for responding to the access request begins to run from the time the valid request (receives additional information and proof of identity where necessary) is made by any means not only through a designated form.

Glencree may seek to extend the time to respond by a further two months if the request is complex or Glencree has received a number of requests from the same individual. Glencree will still inform the individual know within one month of receiving their access request and explain to them why the extension is necessary.

Glencree is only legally permitted to send data that relates to the individual. In certain cases, Glencree will have to extract an individual's information and may need to redact some documents to ensure that the organisation is not breaching the data protection rights of others.

If Glencree cannot comply or does not intend comply with the request it must provide valid reasons to the individual and advise that the individual has the right to make a complaint to the Data Commission.

Appendix SAR Form

Subject Access Request (SAR) Form

In order to respond to your request for personal data, you will need to provide us with adequate **Proof of Identity**. Where a request is manifestly unfounded, excessive, of a repetitive nature or where more than one copy of the data is sought, a fee may apply.

Please complete **all parts** of this Form **in full**.

Part 1 – Details of Data Subject (Your Details)

Contact Details (*in block capitals*):

Full Name:

Address:

Eircode:

Contact Phone Number:

E-mail Address:

Part 2 – Details of Request

Help Us to Help You!

To assist us in locating the data you are requesting, please include as many specific details as possible in relation to your interactions with us in the past (e.g., please state the programmes/activities/functions you have corresponded with/the types of applications you may have made, etc).

Please tell us the relevant timelines or dates involved for which you are seeking the personal data).

Please provide us with any other specific details that you feel are relevant in assisting us in locating your personal data. (e.g., by providing us with as much detail as possible in relation to your access request, we will be able to assist you more efficiently).

Part 3 - Declaration

I declare that all the details I have provided in this Form are true and complete to the best of my knowledge and I have provided a proof of identification.

Signature of Requester: _____

Date: _____

Please return the completed Form by post to:

Corporate Services Executive

Glencree Centre for Peace and Reconciliation

Glencree, Co Wicklow, A98 D635

Or to email to info@glencree.ie

Subject Access Request Procedure V1.0

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Version	1.0
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