

Capability Systems Ltd

21, Daisy Close

Bagworth

LE67 1HP

Email: privacy@capability-systems.com

Subject Access Request Policy

POLICY DETAILS	
Policy Title	Subject Access Request Policy
Responsible Authority	Capability Systems Ltd.
Date Adopted	10 th July 2020
Version	1

This procedure is to be followed when an individual contacts Capability Systems Ltd. to request access to their personal information. Requests must be completed within 1 month, so it should be actioned as soon as it is received. Subject Access Requests should be provided free of charge, however, a 'reasonable fee' can be charged when a request is manifestly unfounded or excessive, particularly if it is repetitive.

Capability Systems Ltd will take the following steps to action a request:

1. Confirm that the Subject Access Request (SAR) is valid by:

- Ensuring the request has been received in writing;
- Ensuring the request is sufficiently well-defined – is it clear what personal data is required? If not, clarify with the requestor what personal data they need.
- Ensuring the requestor has supplied their address and valid evidence to prove their identity.

Capability Systems Ltd accepts the following forms of identification:-

* These documents must be dated in the past 12 months,

+ These documents must be dated in the past 3 months:

- Current UK/EEA Passport
- UK Photocard Driving Licence (Full or Provisional)
- Firearms Licence / Shotgun Certificate
- EEA National Identity Card
- Full UK Paper Driving Licence
- State Benefits Entitlement Document*

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State Pension Entitlement Document*

- HMRC Tax Credit Document*
- Local Authority Benefit Document*
- State/Local Authority Educational Grant Document*
- HMRC Tax Notification Document
- Disabled Driver's Pass

Financial Statement issued by bank, building society or credit card company+

- Judiciary Document such as a Notice of Hearing, Summons or Court Order
- Utility bill for supply of gas, electric, water or telephone landline+
- Most recent Mortgage Statement
- Most recent council Tax Bill/Demand or Statement
- Tenancy Agreement
- Building Society Passbook which shows a transaction in the last 3 months and your address.

2. In order to respond to a Subject Access Request, Capability Systems Ltd. will search all records to which it has access (including archived emails and those that have been deleted but are still recoverable), word documents, spreadsheets, databases, systems, removable media, recordings, paper records in relevant filing systems etc.

3. Capability Systems Ltd. will not withhold personal data because it could be misunderstood and will, if necessary, provide an explanation with the personal data. Capability Systems Ltd. will provide the personal data in an "intelligible form", which includes explaining any codes, acronyms and complex terms. The personal data will be supplied in a permanent form except where the person agrees or where it is impossible or would involve undue effort. Capability Systems Ltd. may agree with the requester that they will view the personal data on screen or inspect files on its premises.

Capability Systems Ltd. will redact any exempt personal data from the released documents and explain why that personal data is being withheld.

4. Capability Systems Ltd. will ensure that staff are aware of correct processes through induction and training and by establishing and maintaining appropriate day to day working practices.

5. Capability Systems Ltd. will ensure a record is maintained to demonstrate the volume of requests received and compliance against the statutory timescale.

6. Before responding to a Subject Access Request Capability Systems Ltd. will screen the information to ensure it can be disclosed and is not subject to an exemption. Examples of exemptions include:

- References provided by Capability Systems Ltd. in confidence
- Information accessible by other means

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- Information intended for future publication
- Information that could prejudice law enforcement
- Personal data of third parties. Legal advice should always be sought before relying on an exemption. Capability Systems Ltd. will ensure that the personal information of individuals who have not given their consent to share their personal information with others is redacted before the Subject Access Request response is sent out.

7. Responses to a SAR should include a copy of the personal data in addition to confirmation of:

a) the purposes of the processing;

b) the categories of personal data concerned;

c) the recipients or categories of recipients to whom personal data has been or will be disclosed, in third countries or international organisations, including any appropriate safeguards for transfer of data, such as Binding Corporate Rules or EU model clauses;

d) where possible, the envisaged period for which personal data will be stored, or, if not possible, the criteria used to determine that period;

e) 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;

f) the right to lodge a complaint with the Information Commissioners Office (“ICO”);

g) the source of such data;

h) the existence of any automated decision-making, including profiling and any meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

8. When responding to a complaint, Capability Systems Ltd. will advise the requestor that they may complain to the Information Commissioners Office (“ICO”) if they remain unhappy with the outcome.