



SUBJECT ACCESS REQUEST POLICY

| Document Control | |
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| Reference | LINK013 Subject Access Request Policy |
| Version & Status | v4.0 |
| Purpose/ remit | This document describes the process relating to Subject Access Requests within The Link and the organisation's overall approach to ensure compliance with applicable laws and business objectives. |
| Owner | HR, Information Governance Team |
| Approval body | CEO, Information Governance Lead |
| Date of issue | March 2024 |
| Review Date | March 2026 |
| Applies to | All Staff |
| Notes | To be read in conjunction with Related Documents detailed below. |
| Classification | Public |

| Related Documents | |
|-------------------|---------------------------------|
| Reference: | Purpose/remit of policy: |
| N/A | N/A |

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AIM

You have a right, under the UK-General Data Protection Regulation (UK-GDPR), to access the personal data we hold on you. To do so, you should make a subject access request, and this policy sets out how you should make a request, and our actions upon receiving the request.

DEFINITIONS

“Personal data” is any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier, including your name. “Special categories of personal data” includes information relating to:

- Race
- ethnic origin
- Politics
- Religion
- trade union membership
- Genetics
- biometrics (where used for ID purposes)
- Health
- sex life or
- sexual orientation.

MAKING A REQUEST

Although subject access requests may be made verbally, we would advise that a request may be dealt with more efficiently and effectively if it is made in writing. If you wish to make a request, please write to the Data Protection Officer (DPO), 101 The Greenway, Middlesbrough, TS3 9PA, info@redcarlink.com.

Requests that are made directly by you should be accompanied by evidence of your identity. If this is not provided, we may contact you to ask that such evidence be forwarded before we comply with the request.

Requests made in relation to your data from a third party should be accompanied by evidence that the third party is able to act on your behalf. If this is not provided, we may contact the third party to ask that such evidence be forwarded before we comply with the request.

TIMESCALES

Usually, we will comply with your request without delay and at the latest within one month. Where requests are complex or numerous, we may contact you to inform you that an extension of time is required. The maximum extension period is two months.

FEE

We will normally comply with your request at no cost. However, if the request is manifestly unfounded or excessive, or if it is repetitive, we may contact you requesting a fee. This fee must be paid in order for us to comply with the request. The fee will be determined at the



relevant time and will be set at a level which is reasonable in the circumstances. In addition, we may also charge a reasonable fee if you request further copies of the same information.

INFORMATION YOU WILL RECEIVE

When you make a subject access request, you will be informed of:

- whether or not your data is processed and the reasons for the processing of your data;
- the categories of personal data concerning you;
- where your data has been collected from if it was not collected from you;
- anyone who your personal data has been disclosed to or will be disclosed to;
- how long your data is kept for (or how that period is decided);
- your rights in relation to data rectification, erasure, restriction of and objection to processing;
- your right to complain to the Information Commissioner if you are of the opinion that your rights have been infringed;

CIRCUMSTANCES IN WHICH YOUR REQUEST MAY BE REFUSED

We may refuse to deal with your subject access request if it is manifestly unfounded or excessive, or if it is repetitive. Where it is our decision to refuse your request, we will contact you without undue delay, and at the latest within one month of receipt, to inform you of this and to provide an explanation. You will be informed of your right to complain to the Information Commissioner and to a judicial remedy.

We may also refuse to deal with your request, or part of it, because of the types of information requested. For example, information which is subject to legal privilege or relates to management planning is not required to be disclosed. Where this is the case, we will inform you that your request cannot be complied with and an explanation of the reason will be provided.

Appendix A: Review & Sign-Off Log

| Date | Version | Changes | Approval Signature |
|------------|---------|---|--------------------|
| 26.07.23 | 2.0 | Policy reformatted to include document control and sign off log | H Gibson (HR) |
| 06.03.24 | 3.0 | Policy reformatted, added in contents page | J Leopard (CEO) |
| 25.03.2025 | 4.0 | Annual review & Sign off | J Leopard (CEO) |
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