



## Much Wenlock Town Council

# SUBJECT ACCESS POLICY

### Procedure for dealing with Subject Access Requests ("SAR")

1. Data subjects will be informed of their right to access data.
2. All requests should either be in writing to the following address:  
  
The Town Clerk  
Much Wenlock Town Council  
The Corn Exchange  
High Street  
Much Wenlock  
TF13 6AE  
  
or be email to: [townclerk@muchwenlock-tc.gov.uk](mailto:townclerk@muchwenlock-tc.gov.uk)
3. Where information is requested in an electronic form any personal data will be provided by electronic means where possible.
4. Upon receipt of a SAR the data subject will be informed whether the Town Council is the controller of the data subject's personal data. If the Town Council is not the controller and merely a processor, the data subject will be referred to the actual controller.
5. The identity of the data subject will be verified before the SAR is processed.
6. All SARs will be verified to ensure they can be sufficiently substantiated. If it is not clear to the data controller what personal data is required additional information will be requested.
7. A SAR will be refused, or a reasonable fee charged, if it is deemed to be unfounded or excessive (in particular because of its repetitive character).
8. A SAR request will be acknowledged promptly and at the latest within one month of receipt of the request. If more time is needed to respond to complex requests, an extension of another two months will be applied and the data subject will be notified within the first month.
9. The data subject will be notified if any costs will be involved in processing the data requested.
10. If the Town Council cannot provide the information requested, the data subject will be informed of this decision without delay and at the latest within one month of receipt of the request.
11. The progress of each SAR request will be monitored.

12. Where data requested involves data on other data subjects this data will be redacted before it is supplied to the data subject. Where it cannot be redacted other data subjects will be asked for their consent to supply the data as part of the SAR.
13. A reason will be given to the data subject as to why personal data is being withheld.
14. For each data subject that is processed the following information will be included in the SAR response:
  - the purpose of the processing;
  - the categories of personal data concerned;
  - the recipients or categories of recipients to whom personal data has been or will be disclosed, in particular in third countries or international organisations, including any appropriate safeguards for transfer of data, such as Binding Corporate Rules<sup>1</sup> or EU model clauses<sup>2</sup>;
  - where possible, the envisaged period for which personal data will be stored, or, if not possible, the criteria used to determine that period;
  - 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;
  - the right to lodge a complaint with the Information Commissioners Office (“ICO”);
  - if the data has not been collected from the data subject: the source of such data;
  - 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.
15. A copy of the personal data undergoing processing will be provided with each SAR.
16. Personal data will not be withheld because it could be misunderstood.
17. An explanation will be included with all personal data that is in an “intelligible form”, including an explanation of any codes, acronyms and complex terms.
18. All data will be supplied in a permanent form except where the person agrees or where it is impossible or would involve undue effort. If the data subject so requests they will be invited to view the personal data on screen or inspect files on our premises.
19. Where a data subject is not satisfied with a response to a SAR the Town Council will manage this as a complaint.

*Adopted 7 June 2018*

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<sup>1</sup> “Binding Corporate Rules” is a global data protection policy covering the international transfer of personal data out of the European Union. It requires approval of a data protection regulator in the European Union. In most cases this will be the relevant regulator where an organisation's head quarters is located. In the UK, the relevant regulator is the Information Commissioner's Office.

<sup>2</sup> “EU model clauses” are clauses approved by the European Union which govern the international transfer of personal data. The clauses can be between two data controllers or a data controller and a data processor.