



camlin

Camlin Group

Data Subject Request Procedure

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1. Introduction

This procedure sets out the key features regarding handling or responding to requests for access to personal data made by data subjects, their representatives or other interested parties. This procedure will enable the Camlin Group (hereinafter referred to as “Camlin”) to comply with legal obligations, provide better employee and customer care, improve transparency, enable individuals to verify that information held about them is accurate, and increase the level of trust by being open with individuals about the information that is held about them.

This procedure applies broadly across all entities or subsidiaries owned or operated by Camlin but does not affect any state or local laws or regulations which may otherwise be applicable.

In accordance with both EU GDPR and UK GDPR (and thus the Data Protection Act 2018), data subjects have the right to make a Subject Access Request (SAR) i.e. to see or view their own personal data held by Camlin, as well as to request copies of the data, subject to certain exemptions set out in Schedule 2 of the Data Protection Act 2018.

2. Subject Access Requests

2.1 The Rights of a data subject

The rights to data subject access include the following:

- Know whether a data controller holds any personal data about them.
- Receive a description of the data held about them and, if permissible and practical, a copy of the data.
- Be informed of the purpose(s) for which that data is being processed, and from where it was received.
- Be informed whether the information is being disclosed to anyone apart from the original recipient of the data; and if so, the identity of those recipients.
- The right of data portability. Data subjects can ask that their personal data be transferred to them or a third party in machine readable format (Word, PDF, etc.). However, such requests can only be fulfilled if the data in question is: 1) provided by the data subject to the Camlin, 2) is processed automatically and 3) is processed based on consent or fulfilment of a contract.
- If the data is being used to make automated decisions about the data subject, to be told what logic the system uses to make those decisions and to be able to request human intervention.

Camlin must provide a response to data subjects requesting access to their data within 30 calendar days of receiving the SAR unless local legislation dictates otherwise.

2.2 SARs Generally

The following general points apply to SARs based on *Article 12* of the *EU GDPR* & *UK GDPR*:

- a) Information shall be provided to the data subject in a concise, transparent, intelligible and easily accessible form, using clear and plain language, in particular for any information addressed specifically to a child.
- b) Information may be provided in writing, or electronically or by other means.
- c) The data subject may request the information orally (e.g. over the telephone or face to face), as long as the identity of the data subject has been established.
- d) Camlin must act on a request from a data subject unless we are unable to establish their identity.
- e) Camlin must provide information without undue delay and within a maximum of one month from the receipt of the request.
- f) The response timescale may be extended by up to two further months for complex or a high volume of requests – the data subject must be informed of this within one month of the request, and the reasons for the delay given.
- g) If a request is made via electronic form, the response should be via electronic means where possible, unless the data subject requests otherwise.
- h) If it is decided that we will not comply with a request, we must inform the data subject without delay and at the latest within a month, stating the reason(s) and informing the data subject of their right to complain to the supervisory authority.
- i) Generally, responses to requests will be made free of charge, unless they are “*manifestly unfounded or excessive*” (*GDPR Article 12*), in which case we will either charge a reasonable fee or refuse to action the request.
- j) If there is doubt about a data subject’s identity, we may request further information to establish it.

2.3 How to make a SAR

Any employee or non-employee of Camlin who would like to make a SAR should send their request by email to informationsecurity@camlingroup.com or by post to Information Security Manager, 31 Ferguson Drive, Knockmore Hill Industrial Park, Lisburn, BT28 2EX.

A SAR form is available on the Camlin Group website or on Bamboo for Camlin employees. Camlin will require proof of identification to be able to satisfy the data subject's identity before the request can be processed.

2.4 SAR Process

Step	Description	Person
Data subject request received	The data subject submits a request via one of a number of methods, including electronically (via email) or by letter. This may be received by any part of the Camlin but should ideally be channeled through the ISMS team. A <i>Data Subject Request Form</i> is available for this purpose.	Information Security Manager
Log data subject request	The fact that the request has been received is logged in the <i>Data Subject Request Register</i> and the date of the request recorded.	Request Administrator
Confirm identity of data subject	The identity of the data subject is confirmed via an approved method. More information may be requested to confirm identity if required. If the identity of the data subject cannot be confirmed, the request is rejected and the reason for this communicated to the data subject.	Request Administrator
Evaluate validity of request	The test of whether the request is " <i>manifestly unfounded or excessive</i> " is applied. If so, a decision is made whether to reject the request or apply a charge to it.	Request Administrator Information Security Manager

Charge for request	If a charge is applied, the data subject is informed of the charge and has an opportunity to decide whether or not to proceed. If the data subject decides not to proceed, the request is rejected, and the reasons communicated.	Request Administrator Information Security Manager
Compile requested information	The relevant information is compiled. A maximum of one month is permitted; if the request will take longer than that then a maximum of two further months are allowed and the data subject must be informed of the delay and the reasons for it within one month of the request being submitted.	Request Administrator Information Security Manager
Take requested action/provide requested information	The requested action is carried out (if applicable) and the information requested is provided to the data subject electronically, if that is the preferred method, or via other means.	Request Administrator
Close data subject request	The fact that the request has been responded to is logged in the <i>Data Subject Request Register</i> , together with the date of closure.	Request Administrator

Table 1 - SAR Process

2.5 Response

When determining what personal data may be held to respond to a request, authorised personnel will be tasked to search and return all applicable records held within our organisation.

Responses will generally be provided in electronic form where the individual has made a request electronically. We will normally respond to a request as soon as practicable, and in most cases within a period of one month from the date it is received. In some cases, such as where the request is more complex, it may respond within three months of the date when the request is received. We will write to the individual within one month of receiving the original request to tell the individual if this is the case.

If an individual, following a request for information is dissatisfied with the outcome of a response they may seek a review of the decision by writing to Camlin's Information Security Manager.

If you believe that we have not complied with our obligations, you may raise your concerns with the Information Commissioner's Office (ICO) who will make an independent judgment. You should contact the ICO via their website www.ico.org.uk.

2.6 Consent & Direct Marketing

Where Camlin relies on an individual's consent to process their personal data, in particular around its marketing, we will ensure we have clear documentary evidence that the data subject has opted-in to this type of processing. An individual has a right at any time to opt-out and our system and processes we have processes in place to manage the withdrawal of consent.

2.7 Retention and Disposal

Personal data (and sensitive personal data) will be held in accordance with the Camlin Group ISMS Privacy and Personal Data Protection Policy and UKGDPR Privacy Statement for Employees, Workers and Contractors and UKGDPR Candidate Privacy Statement.

Personal data (and sensitive personal data) should not be retained for any longer than necessary. The length of time which data should be retained will depend upon the circumstances, including the reasons why the personal information was obtained. Employees should comply with the Camlin Group ISMS Record Retention and Protection Policy. Where there is any uncertainty, employees should seek advice from the Information Security Manager.

2.8 Employee Training & Administration

Camlin will ensure that all employees processing personal data receive training on data protection.

2.9 Exemptions

An individual does not have the right to access information recorded about someone else, unless they are an authorized representative, or have parental responsibility.

Camlin is not required to respond to requests for information unless it is provided with sufficient details to enable the location of the information to be identified, and to satisfy itself as to the identity of the data subject making the request.

In principle, Camlin will not normally disclose the following types of information in response to a SAR:

- Information about other people – A SAR may cover information which relates to an individual or individuals other than the data subject. Access to

such data will not be granted, unless the individuals involved consent to the disclosure of their data.

- Repeat requests – Where a similar or identical request in relation to the same data subject has previously been complied with within a reasonable time period, and where there is no significant change in personal data held in relation to that data subject, any further request made within a six month period of the original request will be considered a repeat request, and Camlin will not normally provide a further copy of the same data
- Publicly available information – Camlin is not required to provide copies of documents which are already in the public domain.
- Opinions given in confidence or protected by copyright law – Camlin does not have to disclose personal data held in relation to a data subject that is in the form of an opinion given in confidence or protected by copyright law.
- Privileged documents – Any privileged information held by Camlin need not be disclosed in response to a SAR. In general, privileged information includes any document which is confidential (e.g. a direct communication between a client and his/her lawyer) and is created for the purpose of obtaining or giving legal advice.

2.10 Responsibilities

If Camlin acts as a data controller towards the data subject making the request then the SAR will be addressed based on the provisions of this procedure.

If Camlin acts as a data processor the Information Security Manager will forward the request to the appropriate data controller on whose behalf Camlin processes personal data of the data subject making the request.

3. Appendix

Subject Access Request Form

1. Details of person requesting the information

Full name	
Current address (including postcode)	
Length of time at this address	
Telephone number	
Date of birth	
Email	
Preferred method of contact	

2. Proof of identity

We may request additional information from the data subject to confirm their identity.

3. Written authority of applicant

If you are acting on behalf of the data subject (i.e. the person to whom the information is about), their written authority is required. Please complete the details below. Please also state your relationship to the data subject (e.g. solicitor, client, parent, child etc.)

Your Full name:

Current address (including postcode):

Telephone number:

Relationship to applicant:

Signature:

4. Information required

Please provide details of the information you are requesting, together with any other relevant information (dates, times, locations etc.). This will help us to identify the information you require.

If you only want to know what information is held in specific records, please indicate in the box below.

Please tell us if you know in which capacity the information is being held, together with any names or dates you may have. If you do not know exact dates, please give the year(s) that you think may be relevant.

Employment Records ☐

If you are now or have been employed by Camlin and are seeking personal information in relation to your employment, please provide details of your Staff number/Division/Dates of employment.

Data Subject Declaration:

I certify that the information provided on this form is correct to the best of my knowledge and that I am the person to whom it relates. I understand that Camlin is obliged to confirm proof of identity/authority and it may be necessary to obtain further information in order to comply with this subject access request.

Name:	
Signature:	
Date:	
OR	
Authorised person – Declaration (if applicable): I confirm that I am legally authorised to act on behalf of the data subject. I understand that Camlin is obliged to confirm proof of identity/authority and it may be necessary to obtain further information in order to comply with this subject access request.	
Name:	
Signature:	
Date:	

Warning: a person who unlawfully obtains or attempts to obtain data is guilty of a criminal offence and is liable to prosecution.

I wish to: <input type="checkbox"/> Receive the information in electronic format (some files may be too large to transmit electronically, and we may have to supply in an alternative format) <input type="checkbox"/> Receive the information by post* <input type="checkbox"/> Collect the information in person <input type="checkbox"/> View a copy of the information only
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*Please be aware that if you wish us to post the information to you, we will take every care to ensure that it is addressed correctly. However, we cannot be held liable if the information is lost in the post or incorrectly delivered or opened by someone else in your household.

Please send your completed form and proof of identity to:

Information Security Manager

31 Ferguson Drive

Knockmore Hill Industrial Park

Lisburn

BT28 2EX

informationsecurity@camlingroup.com

Template Owner:	Camlin Group
Template Ref:	
Template CO:	-