

# DATA SUBJECT ACCESS REQUEST POLICY

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The General Data Protection Regulation (GDPR) gives individuals (Data Subjects} rights of access to their personal records held by Churches Fire Security Limited.

## Policy Statement

Churches Fire Security Limited regards the General Data Protection Regulation as an important mechanism in achieving an honest and safe relationship with its clients, prospective clients and employees. The General Data Protection Regulation entitles an individual, with certain exceptions, to a copy of both manual data recorded in a relevant filing system and computer data relating to them together with reasoning's as to why it is being processed and the sources and destination of the data. A request for such information under the GDPR is known as a Subject Access Request. All records that contain personal data of individuals held and maintained by Churches Fire Security Limited will be subject to the General Data Protection Regulation.

## Scope of the Policy

This document outlines how an applicant can make a request for their personal information under the GDPR. This is not a legal document. It does not confer rights nor override any legal or statutory provisions which either require or prevent disclosure of personal information.

## Key Definitions

### Personal Data

Data relating to a living individual who can be identified from that data and other information in, or is likely to come into Churches Fire Security Limited's possession. Personal data can be factual (such as a name, address or date of birth) or it can be an opinion (such as a performance appraisal).

### Sensitive Personal Data

Includes information about a person's racial or ethnic origin, political opinions, religious or similar beliefs, trade union membership, physical or mental health or condition or sexual life, or about the commission of, or proceedings for, any offence committed or alleged to have been committed by that person, the disposal of such proceedings or the sentence of any court in such proceedings. Sensitive personal data can only be processed under strict conditions, and will usually require the express consent of the person concerned.

### Data Controller

The organisation which determines the purposes for which, and the manner in which, any personal data is processed. Churches Fire Security Limited is the data controller of all personal data used and held within each individual department.

### Data Processor

Includes any person or 3<sup>rd</sup> party company who processes personal data on behalf of Churches Fire Security Limited. Employees of data controllers are excluded from this definition but it could include suppliers which handle personal data on our behalf.

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## Data Subject

A living individual who is the subject of personal data. The 'data subject' need not be a United Kingdom national or resident. Provided that the data controller is subject to the General Data Protection Regulation, rights with regards to personal data are available to every data subject, wherever his nationality or residence.

## Roles and Responsibilities

### Managing Director:

The Managing Director holds overall responsibility for Subject Access Requests but can delegate day to day operational responsibility to others in the organisation.

### Data Protection Officer (DPO):

The DPO has executive responsibility for the management of Subject Access Requests; this includes dealing with complaints from the Information Commissioners Office, general compliance issues and data subject queries and concerns.

## Dealing with subject access requests

A formal request from a data subject for information that we hold about them (either for our own purposes, or on behalf of another controller or processor) must be made in writing. A fee may be payable by the data subject for provision of this information where unreasonable cost is incurred in processing the request. Any member of staff who receives a written request should forward it to their manager immediately.

## Review of the Policy

This policy will be kept under review to ensure that Churches Fire Security Limited meets the statutory requirements and any codes of practice made under the General Data Protection Regulation.

## Additional Notes

This policy does not form part of the formal contract of employment or contract for services, but it is a condition of employment or engagement that employees, workers or contractors will abide by the rules and policies made by the Company.

The Company reserves the right to review this policy at any time and to make such changes as it considers appropriate. If this is necessary in order to reflect changes in legislation, such changes or terminations may be made without advance notice.