

# Subject Access Request Policy – City Financial Marketing Group Limited (hereafter CFM Group)

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## **Purpose**

To provide a guidance to all employees involved in the handling and processing of “Subject Access Requests” (SAR’s) received under the GDPR.

## **Scope**

All personal data processed by CFM Group is within the scope of this procedure.

Data subjects are entitled to obtain:

- Confirmation as to whether CFM Group is processing any personal data about that individual;
- Access to their personal data;
- Any related information;

## **Policy Statement**

Subject Access Requests are to be made using the Subject Access Request Form.

This form will be located on the Company website [www.cfmgroup.ie](http://www.cfmgroup.ie)

This form should be held as an internal SAR record.

## **Roles and Responsibilities**

The GDPR representative for CFM Group Elaine Maher is responsible for the application and effective working of this procedure, and for reporting to the information or data owner regarding Subject Access Requests (SARs). The GDPR representative is responsible handling all SARs.

## ***Data Subject***

- The data subject provides CFM Group with evidence of their identity in the form of (a current passport/driving license), and the signature on the identity must be cross-checked to that on the Subject Access Request form.
- The data subject specifies to CFM Group specific sets of data held by CFM Group on their subject access request form (SAR).
- The data subject can request all data held on them.



## *Data Collection Process*

- CFM Group records the date that the identification checks were conducted, and the specification of the data sought.
- CFM Group provides the requested information to the data subject within **one month** from this recorded date. Under the GDPR Article 12(3), that period may be extended by two further months where necessary, considering, the complexity and number of the requests received.
- The controller CFM Group shall inform the data subject of any such extension within one month of receipt of the request, together with the reasons for the delay.
- Where the data subject makes the request by electronic form, the information shall be provided by electronic means where feasible unless otherwise requested by the data subject.
- Once received, the subject access request (SAR) application is immediately forwarded to the GDPR representative, who will ensure that the requested data is collected within the specified time frame.
- Collecting the data specified by the data subject, and or searching all databases and all relevant filing systems (manual files) in Company Name, including all back up and archived files (computerised or manual) and all email folders and archives.
- The GDPR representative maintains a record of requests for data and of its receipt, including dates.
- The GDPR representative reviews all documents that have been provided to identify whether any third parties are present in it, and either removes the identifying third party information from the documentation or obtains written consent from the third party for their identity to be revealed.
- If any of the requested data is being held or processed under one of the following exemptions, it does not have to be provided:
  - National Security
  - Crime and taxation
  - Health
  - Education
  - Social Work
  - Regulatory work
  - Journalism, literature and art
  - Research, history and statistics
  - Publicly available information
  - Corporate finance
  - Domestic processing



- Confidential references
  - Judicial appointments, honours and dignities
  - Crown of ministerial appointments
  - Management forecasts
  - Negotiations
  - Legal advice and proceedings
  - Self-incrimination
  - Human fertilization and embryology
  - Adoption records
  - Special educational needs
  - Parental records and reports
- In the event, that, a data subject, requests CFM Group to provide them with the personal data stored by the controller, then CFM group will provide the data subject with the requested information in electronic format, unless otherwise specified.
  - All the items provided to the data subject should be clearly listed along with the data subject's name and the date on which the information is delivered to (and received by) the data subject.
  - Should a data subject, request what personal data is being processed then CFM Group provides the data subject with the following information:
    - Purpose of the processing
    - Categories of personal data
    - Recipient(s) of the information, including recipients in third countries or international organisations
    - How long the personal data will be stored
    - The data subject's right to request rectification or erasure, restriction or objection, relative to their personal data being processed.
    - CFM Group removes personal data from systems and processing operations as soon as a request for erasure has been submitted by the data subject.
    - CFM Group contacts and communicates with other organisations, where the personal data of the data subject is being processed, to cease processing information at the request of the data subject.
  - CFM Group takes (appropriate measures) without undue delay considering that the data subject may have:
    - withdrawn consent,
    - objected to the processing of their personal data in whole or part;
    - no legal obligation and/or the data has been unlawfully processed.
  - Information on the source of the personal data if it has not been collected from the data subject.
  - Inform the data subject of any automated decision-making.
  - If and where personal data has been transferred and information on any safeguards in place.



## **Definitions**

**SAR- Subject Access Request** – A request made by an individual or employee to see all personal information the company holds about them.

## **Related Documentation**

CFM Group uses the following electronic formats to respond to SARs:

## **Contacts**

- Elaine Maher, GDPR representative [GDPR@cfmgroup.ie](mailto:GDPR@cfmgroup.ie) 01 660 6900

## **Policy Review**

- Policy Prepared For: **City Financial Marketing Group Limited**
- Approved by Managing Director On: **May 9<sup>th</sup> 2018**
- Policy Became Operational On: **May 25<sup>th</sup> 2018**
- Next Review Date: **January 2019**

