**CORNWALL RURAL COMMUNITY CHARITY**

**Subject Access Request Policy**

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| **Version** | **Author** | **Date** | **Changes** |
| V1 | Nicki Sweeney | 1.2.2021 | creation |
| V 1.2 |  | 16.1.23 | Review and job title update |
| V1.3 |  |  |  |
| V1.4 |  |  |  |

**CORNWALL RURAL COMMUNITY CHARITY ~** Data Subject Access Request Policy

Statement of Policy

As part of our business, CRCC captures personal data about the people who use our services, employees, suppliers and volunteers. We take protecting your information seriously and comply with the EU’s General Data Protection Regulations (GDPR) and the UK’s Data Protection 2018 (DPA).

This policy informs you of your rights, under Article 15 of the GDPR, when requesting copies of your information from CRCC and how you can go about making a ***Subject Access Request.***

You can request copies of your information in any reasonable way you would like, by contacting CRCC online, by email, in writing or over the phone. Contact details can be found at the end of this document.

In order to deal with your request, CRCC must be able to verify your identity to prevent us disclosing personal information to an unauthorised person. We may also need to ask for additional information in order to accurately locate your records with us.

Personal information

Personal information can be anything that identifies and relates to a living person. This can include information that, when put together with other information, can then identify a person. For example, this could be your name, contact details, or national insurance number.

Why do we have your personal information?

We may need to have some information about you to:

* Deliver services and support to you (e.g. information and advice services, training, email newsletters).
* Manage those services we provide to you.
* Recruit, train and manage the employment of our workers who deliver those services.
* Help follow up any feedback or concerns you have about our services.
* Monitor the effectiveness of our services.
* Check the quality of services (internally and by external organisations).
* Help with research and planning of new services.

CRCC is the Data Controller with regards to your information, which means we determine the manner in which personal data is used and stored, and for what purposes; this can either be alone, or can be jointly with another organisation, where we are in a partnership within a particular project or service. We will have told you about partner organisations, if relevant, before you gave us your information.

Other partner organisations

Where your information is shared with other organisations in certain partnership contracts, CRCC will tell these organisations about your Subject Access Request. If an organisation holds their own records about you, or where we have simply passed on your information, with your permission, to another organisation as part of a referral process, we are not the data controller with regards to this information. Should you wish to access the information that another organisation holds about you, you would need to contact them separately to make a Subject Access Request.

Your rights

As defined in Article 15 of the GDPR, your rights as an individual ( or ‘data subject’) are:

* **Right to Be Informed**: the right to confirmation as to whether or not we have your personal data;
* **Right to Access**: to be able to obtain a copy of the personal information we hold (this is known as Subject Access Request);
* **Right to Erasure**: the right to have your data erased (although this will not apply where it is necessary for us to continue to use the data for a lawful reason);
* **Right to Rectification**: the right to have inaccurate data rectified;
* **Right to Restrict Processing**: to request that we hold your data but do not use it for any further purpose;
* **Right to Object**: the right to object to your data being used for marketing or profiling;
* **Right to Data Portability**: where technically feasible, you have the right to have the personal data you have provided to us (which we process automatically on the basis of your consent or the performance of a contract) to be provided in a commonly used and machine-readable format and to reuse it for your own purposes;
* **Rights Related to Automated Decision Making and Profiling**: we do not use automated decision making or profiling.

This policy relates to the ***Right to Access***. We are required to provide a copy of your personal data that we process (use and store) if you request it. For any further copies requested by you, CRCC may charge a reasonable fee based on administrative costs.

How CRCC will carry out your request

CRCC are required to provide you with a copy of your information within 1 calendar month of a valid request, once all necessary information has been received.

In circumstances where CRCC cannot meet this deadline, we will notify you within that month, providing an explanation for the delay and a realistic estimate of when you should expect the information. This must be no longer than 3 months from the request being made.

Unless explicit consent is given by the relevant persons, any information contained within your information relating to another person or persons will be redacted (blocked out).

Where requests are excessive or frequent, and in line with legislation, CRCC reserves the right to charge a reasonable fee to cover the costs of providing the information. We will tell you if this is the case.

CRCC will retain a copy of your Subject Access Request for 6 months from providing it to you, after which time it will be destroyed. As required by the GDPR, all information we hold about you will eventually be destroyed as a matter of course, once we no longer need to hold this information. Please see our Privacy Notice for more information. Therefore, please keep a copy of the information we provide following a Subject Access Request, as we may not be able to access this information again in the future.

How to make a subject access request

To make a data subject access request, please contact us at [dataadmin@cornwallrcc.org.uk](mailto:dataadmin@cornwallrcc.org.uk) or contact the member of staff who normally works with you, who will forward your request to our Compliance Manager. We have a **standard form** that you can fill out that will help us with your request. You do not have to use the form but please ensure we have as much detail as possible about what you need to enable us to respond promptly.

We need to know:

* your full name, including any other names by which we might know you.
* Your contact details, e.g. postal address, email address, phone number.
* What information you need, e.g. if it is in relation to a particular service you have used, dates.
* How you would like to receive the information, e.g. printed out or by email.
* Why you would like to request your information.

If you are unhappy with the way your Subject Access Request has been carried out or the accuracy of the final content, you can raise these concerns by contacting us at:

Compliance Manager

CRCC

1st Floor

The Chambers

Penryn Street

Redruth

TR15 2SP

Or call 01872 273952

Or email [dataadmin@cornwallrcc.org.uk](mailto:dataadmin@cornwallrcc.org.uk)

If you are still unhappy with the outcome and would like to complain to the ICO, then you can do so at:

The Information Commissioner’s Office

Wycliffe House

Water Lane

Wilmslow

SK9 5AF

[www.ico.org.uk/make-a-complaint/](http://www.ico.org.uk/make-a-complaint/)