



Subject Access Request and Request for Information Procedure

Statement:

Squaricle Group views security and privacy as integral to the function of the business. This commitment ensures compliance with the General Data Privacy Regulations. Keeping our staff informed and policies enforced is a crucial aspect to this commitment. All personal data processed by Squaricle Group is within the scope of this procedure. This procedure excludes personal data that is asked for as a matter of routine by data subjects e.g. holiday remaining or pay information.

Data subjects are entitled to ask whether Squaricle Group is processing any personal data about that individual and, if so, to be given:

- a description of the personal data
- the purposes for which it is being processed
- details of who will be allowed to see the personal data

Data subjects are entitled to be given a copy of the information and to be told about the sources from which Squaricle Group derived the information.

Responsibilities:

- 1.1 Squaricle Group is responsible for the application and effective working of this procedure, and for recording any Subject Access Request (SAR)
- 1.2 Squaricle Group is responsible for handling all SARs.

Procedure:

- 2.1 Subject Access Requests and Requests for Information ideally is recorded electronically. (via email as an example) although verbally is permissible.
- 2.2 The data subject must provide evidence as to his/her identity, in the form of a current passport/driving license, and the signature on the identity must be cross-checked where appropriate.



- 2.3 The data subject must identify the data that is being requested and where it is being held and this information must be shown on the SAR/RFI application form. (NOTE: The data subject is entitled to ask for all data that Squaricle Group holds, without specifying that data although you can deem this to be excessive if it is.)
- 2.4 The date by which the identification checks and the specification of the data sought must be recorded; Squaricle Group has one month from the approved receipt date to provide the requested information. There is an option for a 60-day extension to that one month but that is it. Failure to provide the requested information within that period is a breach of the GDPR.
- 2.5 The SAR application is immediately forwarded to Squaricle Group, who will ensure that the requested data is collected within the time frame.
- 2.6 Collection will entail either:
 - 2.6.1 Collecting the data specified by the data subject, or
 - 2.6.2 Searching all databases and all relevant filing systems (manual files) in Squaricle Group, including all back up and archived files, whether computerised or manual, and including all e-mail folders and archives. Squaricle Group maintains a data map that identifies where all data in the organisation is stored.
- 2.7 Squaricle Group maintains a record of requests for data and of its receipt, including dates.
- 2.8 Data may not be altered or destroyed in order to avoid disclosing it.
- 2.9 Squaricle Group is responsible for reviewing all provided documents to identify whether any third parties are identified in it and for either excising identifying third party information from the documentation or obtaining written consent from the third party for their identity to be revealed.
- 2.10 If the requested data falls under one of the following exemptions, it does not have to be provided:
 - Crime prevention and detection.
 - Negotiations with the requester.
 - Management forecasts.
 - Confidential references given by Squaricle Group (not ones given to Squaricle Group).



- Information used for research, historical or statistical purposes.
- Information covered by legal professional privilege.

2.11 The information is provided to the data subject in electronic format unless otherwise requested and all the items provided are listed on a schedule that shows the data subject's name and the date on which the information is delivered.

Governance

The Squaricle Group Board have overall responsibility for the implementation of this policy.

Impact and effectiveness

The Director of Operations: Brands, People & Quality is responsible for the management and monitoring of effectiveness of this policy.

They can be contacted at roxy@squariclegroup.com