

# Subject Access Request Procedure

*(under GDPR)*



**Harper Adams  
University**

September 2018

## Subject Access Request Procedure

A subject access request is a request by an individual to have access to the personal data that an organisation holds about him/her.

Under the General Data Protection Regulation (GDPR), Data Subjects have the right to obtain from Data Controllers confirmation as to whether personal data concerning him/her are being processed and have access to that personal data. The University is a Data Controller and therefore requests for access to personal data can be made by individuals who have a relationship with the University or who believe the University holds personal data about them.

Providing access to the data held about individuals, allows them to see what information is held about them and to verify the accuracy and lawfulness of processing of that data.

### Lawfulness of processing by the University

The University processes personal data on the lawful bases set out in Article 6 of the GDPR. The following bases are relied upon by the University in carrying out its functions as a Data Controller:

Article 6

- b. Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract
- c. Processing is necessary for compliance with a legal obligation to which the controller is subject
- e. Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
- f. Processing is necessary for the purposes of legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child

The University also relies on your consent to process special category data under Article 9. For more information on the lawfulness of processing data, please see the privacy notice within the student enrolment form.

### How to make a Subject Access Request

If you wish to make a subject access request in relation to your personal data, please download and complete the Subject Access Request Form and send it along with a copy of your photographic identification to the Data Protection Officer at [dpo@harper-adams.ac.uk](mailto:dpo@harper-adams.ac.uk) or by post to Christopher Munro, Harper Adams University, Newport, Shropshire TF10 8NB. It is helpful if you can outline whether you are after any particular category or type of information, such as counselling notes, tutor assessments or student record.

### Note to University Staff - How to process a Subject Access Request

Staff members receiving a subject access request from a student or other individual, MUST forward the request on to the Data Protection Officer without delay. Staff are asked not to respond to a subject access request without consulting the Data Protection Officer. This is to ensure that the request is properly logged, that all sources of possible information are asked to provide the requested information and to ensure that the request is dealt with in a timely manner as required by the regulations.

## **Content of the University's response**

The University can provide the following information to you following your request. It is important that if you are after some particular information that you specify this in your request, as it will allow us to define our search criteria.

- A copy of your personal data which is being processed by the University
- The purposes for which it processes your personal data
- The different categories of your personal data it processes
- Details of who receives the different categories of your personal data, or who may receive it; in particular if your data is transferred to third countries or international organisations
- How long the University envisages storing your data for, or if not possible the criteria used to determine how long your data may be stored for
- Where the personal data are not collected directly from you, any available information as to the source of the data
- The existence of any automated decision making, including profiling and in that case, meaningful information about the logic involved and the significance and envisaged consequences of such processing for you
- Where personal data is transferred to a third country or to an international organisation, we shall inform you of the appropriate safeguards that are in place in relation to the data transfer

## **Format of the University's response (and large amounts of data)**

The University will normally respond to your request in electronic format. This is the most cost effective and functional format to enable us to provide a quick response.

Where the University holds large amounts of personal data about you, we will request that you specify which information your request relates to before providing a response. In certain circumstances, the University will consider whether the quantity of data involved renders the request manifestly unfounded or excessive. Where the request is deemed manifestly unfounded or excessive the University may charge a reasonable fee for the administrative cost of producing a response or we may refuse to respond.

## **Time limit for response**

The University will respond to your request without delay and at the latest within one month of receipt of the request and necessary identification document.

The period for providing a response can be extended by the University for a further two months where the request is complex or numerous. You will be informed within the one month time limit whether the University feels an extension of time is required and why.

## **Cost of a Subject Access Request**

There is no charge for a response to a subject access request. However, the University may charge a reasonable fee where a request is manifestly unfounded or excessive, or it is repetitive. A fee may also be charged for further copies of the same information. The fee will be based on the administrative cost of providing the information.

## **How to complain**

In the first instance, if you are unhappy with the University's response to your request, you can lodge a complaint with the Data Protection Officer by emailing [dpo@harper-adams.ac.uk](mailto:dpo@harper-adams.ac.uk)

If your complaint is not satisfied, you may contact the [Information Commissioner](#) who is officially appointed to consider such complaints.

*(See below for Subject Access Request Form)*

## Subject Access Request Form

This form is to be completed in full in order to request access to personal data or special category data that the University holds about you. For full details of the information that the University is obliged to provide to you under the General Data Protection Regulation (GDPR), please read the Subject Access Request Procedure in full.

### Part A Your request

Title	
Surname	
Forename(s)	
Staff or Student ID number (if applicable)	
Address	
Telephone number	
Email address	
Any other names by which you have been known (if applicable)	
Relationship to the University (Student/staff/ other – please stipulate)	

If you wish to request only specific documents or information, please describe these fully below, including which department/person holds the document/information:

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#### Please note:

If the University holds a large quantity of information concerning you, we reserve the right to request that you specify the information and processing activities to which your Subject Access Request relates before delivering the information to you (see recital 63 of the GDPR).

### Part B Proof of identity

In order for the University to be satisfied that you are the Data Subject as detailed in Part A, you are required to send along with this completed form, a copy of one of the following photographic identity documents:

- Passport
- Driving licence
- University ID card

If the University is unable to satisfy itself as to your identity from the document supplied, we will contact you as soon as possible.

### **Part C Fee**

The University does not charge a fee for provision of information supplied under a Subject Access Request (as provided in Article 15 of the GDPR). However, the University is entitled to charge a reasonable fee based on administrative costs for the provision of further copies of the information provided under this request, if such further copies are requested. The University may also charge a reasonable fee where it believes a request is manifestly unfounded, excessive or repetitive.

### **Part D Declaration**

I certify that I am the Data Subject named in Part A of this document and that the information provided is true and accurate to the best of my knowledge. I hereby request under the provisions of Article 15 of the General Data Protection Regulation that Harper Adams University provides me with a copy of my personal data and special category data that it processes. I understand that it is necessary for the University to establish my identity in order to provide this information. I enclose a copy of my photographic identity document.

Signed:

Date:

Please return this form along with a copy of your photographic identity document to the Data Protection Officer at [dpo@harper-adams.ac.uk](mailto:dpo@harper-adams.ac.uk)

Alternatively, this form and a copy of the identity document can be posted to the Data Protection Officer:

FAO Data Protection Officer,  
Harper Adams University,  
Newport,  
Shropshire,  
TF10 8NB.