



## RG & SSP

# Data Subject Access Request (SAR) Procedure

(UK and Ireland based colleagues)

**This policy applies to  
colleagues of SSP UK  
& Ireland, RG and  
SSP Group  
colleagues based in  
the UK**

## **Purpose and Scope**

This document provides a guide on how SSP & RG will manage the rights of Data Subjects to access their personal data.

## **Principles**

This policy and associated procedure incorporate the following principles:

- ✓ **Good faith**  
The policy will be applied to all colleagues in a consistent manner and without discrimination.
- ✓ **Fairness**  
Any action taken will be reasonable and necessary. Employees involved are entitled to be treated with courtesy and respect.
- ✓ **Confidentiality**  
Information raised in line with this policy will only be shared with individuals who have a need to know.
- ✓ **Representation**  
Should a colleague be invited to attend a formal meeting to discuss any concerns they are entitled to be accompanied by a representative.

## **Changes to This Privacy Notice**

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

**If you have any questions about this notice, please send an email to [gdpr@ssp-intl.com](mailto:gdpr@ssp-intl.com).**

## **What Must I Do If I Receive a Subject Access Request (SAR)?**

On receipt of a SAR you must forward it immediately to one of the following:

- Colleagues who have left - <http://www.foodtravelexperts.com/international/gdpr/>
- Current Colleagues to – [hr.advisoryteam@ssp.uk.com](mailto:hr.advisoryteam@ssp.uk.com)

We must correctly identify whether a request has been made under the General Data Protection Regulation (GDPR).

We must correctly identify whether a request is one made by an employee or by a customer.

Any colleague who receives a request to locate and supply information relating to a SAR must make a full exhaustive search of the records to which they have access.

All the information that has been requested must be provided unless an exemption can be applied.

In most cases SAR will be undertaken free of charge to the requestor, However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances. We must respond within 30 calendar days.

Managers must ensure that the staff they manage are aware of and follow this guidance.

The relevant department must log the receipt and fulfilment of all requests received from a data subject to see his or her personal information.

Where a Data Subject is not satisfied with a response to a SAR, the Compliance Team must manage this as a complaint and any complaints should be forwarded immediately to [gdpr@ssp-intl.com](mailto:gdpr@ssp-intl.com).

## **Why must I process a Subject Access Request?**

GDPR requires a full disclosure to be made unless there is a legal reason for withholding all or some of the information.

GDPR requires that disclosure must be based on reviewing all personal data relevant to the request.

We should first have correctly identified as a SAR and processed accordingly.

To implement this policy requires the active support of employees who manage the day-to-day processes of their teams.

SSP & RG must be able to evidence its performance under the GDPR to the Information Commissioner's Office (ICO).

GDPR requires an internal complaints process to be in place before a complaint may be escalated to the ICO.

## How Should I process a Subject Access Request?

We must ensure a request has been received in writing where a data subject is asking for sufficiently well-defined personal data held by SSP & RG relating to themselves.

GDPR permits and encourages us to clarify with the requestor what information they need. They must supply their address and valid evidence to prove their identity. SSP & RG accepts the following forms of identification:

- ✓ State Benefits Entitlement Document\*
- ✓ State Pension Entitlement Document\*
- ✓ HMRC Tax Credit Document\*
- ✓ Local Authority Benefit Document\*
- ✓ State/Local Authority Educational Grant Document\*
- ✓ Financial Statement issued by bank, building society or credit card company (*dated in past 3 months*)
- ✓ Utility bill for supply of gas, electric, water or telephone landline (*dated in past 3 months*)
- ✓ Current UK/EEA Passport
- ✓ UK Photo card Driving Licence (Full or Provisional)
- ✓ Firearms Licence / Shotgun Certificate
- ✓ EEA National Identity Card
- ✓ Full UK Paper Driving Licence
- ✓ HMRC Tax Notification Document
- ✓ Disabled Driver's Pass
- ✓ Judiciary Document such as a Notice of Hearing, Summons or Court Order
- ✓ Most recent Mortgage Statement
- ✓ Most recent Council Tax Bill/Demand or Statement
- ✓ Current Council Rent Card
- ✓ Current Council Tenancy Agreement
- ✓ Building Society Passbook which shows a transaction in the last 3 months and your address

\* *Dated within in the past 12 months.*

Depending on the degree to which information is organised and structured, you will need to search emails (including archived emails and those that have been deleted but are still recoverable), Word documents, spreadsheets, databases, systems, removable media (for example, memory sticks etc), tape recordings, paper records in relevant filing systems etc, which your area is responsible for or owns.

You must not withhold information because you believe it will be misunderstood; instead, you should provide an explanation with the information. You must provide the information in an "intelligible form", which includes giving an explanation of any codes, acronyms and complex terms. The information must be supplied in a permanent form except where the person agrees or where it is impossible or would involve undue effort. Any guidance requirement can be sought from The Compliance Department on [gdpr@ssp-intl.com](mailto:gdpr@ssp-intl.com). You may be able to agree with the requester that they will view the information on screen or inspect files on our premises. You must hide any exempt information from the released documents and explain why that information is being withheld.

This SAR Procedure and Guideline should be followed by everyone who receives a SAR.

It is particularly relevant to:

- ✓ Those who are likely to be the first point of contact for SARs (HR Advisory Team, Customer Care Teams and Information Champions);
- ✓ Those who may have to search records for information sought under a SAR.

A database is maintained allowing SSP & RG to report on the volume of requests and compliance against the statutory timescale.

When responding to a complaint, we must advise the requestor that they may complain to the ICO if they remain unhappy with the outcome.

Send Queries to [gdpr@ssp-intl.com](mailto:gdpr@ssp-intl.com).