

## SUBJECT ACCESS REQUEST POLICY

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Our firm must provide a copy of all the personal data undergoing processing, commonly known as a subject access request ('SAR'), when requested. In clear terms, a subject access enables an individual to find out what personal data our firm holds about them.

This must be provided free of charge initially, however, in the event that any further copies are requested, we may charge a reasonable, administrative cost-fee. In this context, excessive or identical requests for a data subject's data are chargeable, as far as is reasonable for the cost our firm incurs.

Our firm must ensure that where the request is made in an electronic form, the subject must receive the requested information in an accessible and commonly used electronic form.

In compliance to Recital 63 of the GDPR, we will endeavour (where possible) to provide a secure system that will grant the data subject direct access to his/her data, however, it must be duly noted that this is not a strict obligation.

Within the requested SAR, we will include:

- The purpose of processing;
- The categories of data processed;
- The recipients, or categories of recipients (in particular, details of disclosure to recipients in third countries or to international organisations).
- Our complaints escalation process

In addition to the above, we will include where practicable:

- The envisaged retention period [of the data], or if this is not possible, the criteria used to determine this period;
- The individual's rights of rectification or erasure, to restrict processing or to object to processing and to lodge a complaint to a supervisory authority;
- Information regarding the source of the data (if not collected from the data subject); and
- Any regulated automated decision taking (i.e. decisions taken solely on an automated basis and having legal or similar effects; also, automated decision taking involving sensitive data) –including information about the logic involved and the significance and envisaged consequences of the processing for the data subject.

In the event that we do not comply with a SAR, we will provide reasons for not doing so.

We note that the data subject's right to access to personal data, should not adversely affect the rights or freedoms of others, including trade secrets or intellectual property and in particular the copyright protecting the software. Where a processor such as ourselves processes a large quantity of information concerning the data subject, we will request that, before any information is delivered, the data subject specify the information or processing activities to which the request relates.