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|  | <p>Princes Risborough Town Council</p> <p>Subject Access Request (SAR) Procedure</p> | <p>Date Agreed</p> <p>30th September 2025</p> |
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1. Introduction

This document outlines the procedure by which Princes Risborough Town Council (hereafter "PRTC") will handle Subject Access Requests (SARs) in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

PRTC has engaged GDPR-*info* Ltd to ensure that all data protection procedures, including SAR handling, are compliant, effective, and auditable.

2. Purpose

The purpose of this procedure is to:

- Enable individuals to exercise their right of access under Article 15 of the UK GDPR.
- Ensure PRTC responds to SARs lawfully, transparently, and within statutory deadlines.
- Protect the rights, freedoms, and personal data of individuals.
- Provide a clear and consistent process for managing SARs.

3. Scope

This procedure applies to all personal data processed by PRTC, whether stored electronically or in hard copy, that is subject to access by data subjects (any individual whose personal data is held by the council).

4. Roles and Responsibilities

Princes Risborough Town Council:

Owns the data.

Has overall responsibility for responding to SARs in a lawful and timely manner.

GDPR-*info* Ltd:

Acts as Data Protection Consultant.

Manages the operational processing of SARs.

Provides guidance, record-keeping, training, and liaison with the Information Commissioner's Office (ICO) where required.

5. Submitting a Subject Access Request

SARs may be made:

In writing (email or post), or

Via the internet using our web page <https://gdpr-info.com/data-protection-contact-form/>

Verbally, in person or by telephone. Request will be acknowledged by email or letter, detailing the request, before the process commences.

Requests must be addressed to:

Clerk to the Council

Princes Risborough Town Council

Wades Centre, Wades Park, Stratton Rd, Princes Risborough HP27 9AX

Email: towncouncil@princesrisboroughtowncouncil.gov.uk

Verification Required:

PRTC or GDPR-info Ltd must verify the identity of the requestor before proceeding, using reasonable evidence such as:

Passport or driving licence

Recent utility bill or council tax statement (proof of address)

In the case that a 3rd party is asking for the request, PRTC or GDPR-info Ltd will need written authority from the individual requestor that the 3rd party has the permission apply for the SAR.

6. What Information Will Be Provided

Upon a valid request, the following will be provided (unless exemptions apply):

- Confirmation that personal data is being processed.
- A copy of the personal data.
- The purposes of processing.
- Categories of personal data.
- Recipients or categories of recipients.
- Retention periods.
- Rights of the individual.
- Information on data source (if not collected from the individual).
- Details of any automated decision-making.

7. Timeframe for Response

Responses to SARs will be provided within one calendar month of receipt. The clock starts when:

- Identity has been verified, and
- Request details are clear.

Extensions:

Where requests are complex or numerous, the deadline may be extended by up to two further months, with notification to the requestor within the initial one-month period.

8. Fees

SARs will be processed free of charge, unless:

- The request is manifestly unfounded or excessive.
- Additional copies are requested.

In such cases, a reasonable fee may be charged, based on administrative costs.

9. Exemptions and Redactions

In accordance with Schedule 2 of the Data Protection Act 2018, some data may be withheld or redacted if:

- It includes personal data of third parties (unless consent has been given or it is reasonable to disclose).
- Disclosure would prejudice law enforcement or regulatory functions.
- Legal professional privilege applies.
- The data involves confidential references or negotiations.

10. Record-Keeping

PRTC will maintain a secure SAR Log, recording:

- Date of receipt
- Identity verification
- Nature of request
- Communications with the data subject
- Final response date
- Any exemptions or redactions applied

This record is maintained for audit and compliance purposes and may be shared with the ICO upon request.

11. Data Format and Delivery

Data will normally be provided in electronic format (secure email or encrypted file). If requested, and feasible, data may also be provided (charged at cost) as:

- Printed copies
- On USB drives (with encryption)

12. Complaints and Escalation

If a requestor is dissatisfied with the response to their SAR, they may:

1. Request an internal review (via the Town Clerk or GDPR-*info* Ltd).
2. Lodge a complaint with the ICO:
 - Website: <https://ico.org.uk>
 - Phone: 0303 123 1113

13. Training and Awareness

All PRTC staff and councillors who handle personal data will receive regular training on:

- SAR procedure
- Data protection principles
- Recognising and escalating requests

Training will be administered and recorded by GDPR-*info* Ltd.

14. Review and Updates

This policy will be reviewed bi-annually or upon changes in legislation, ICO guidance, or organisational structure. Updates will be approved by PRTC and GDPR-*info* Ltd

15. Contact Information

Princes Risborough Town Council

Wades Centre, Wades Park, Stratton Rd, Princes Risborough HP27 9AX

Email: towncouncil@princesrisboroughtowncouncil.gov.uk

GDPR-*info* Ltd

Email: info@gdpr-info.com

Data Protection Consultant & SAR Coordinator

Review date: September 2027