



HELOA Subject Access Request Policy

1. Purpose

This document sets out our policy for responding to subject access requests under the GDPR and explains the rights of the data subject and HELOA's responsibilities when dealing with a subject access request.

2. Individual rights

An individual has the right to know what information is held about them. GDPR in the UK provides a framework to ensure that personal information is handled properly. This information must be:

- Processed fairly, lawfully and in a transparent manner
- Processed for specific, legitimate and lawful purposes
- Adequate, relevant and not excessive
- Accurate and up to date
- Not kept for longer than necessary
- Processed in line with an individual's rights
- Secure
- Not transferred other than in accordance with agreed terms and conditions

3. HELOA's policy on providing information

HELOA is committed to meeting all reasonable requests for access in accordance with the GDPR, whilst protecting HELOA's intellectual property and respecting members' rights to confidentiality when required.

4. What is a subject access request?

A subject access request is a written request for personal information held about an individual by HELOA.

The purpose of a subject access request is to make individuals aware of and allow them to verify the lawfulness of the processing of their personal data. Under the GDPR, members have the right to obtain confirmation as to whether personal data about them is being processed by HELOA. If personal data is being processed, they are entitled to access:

- The reasons why their data is being processed

- The description of the personal data concerning them
- Information about anyone who has received or will receive their personal data
- Details of the origin of their data if it was not collected from them

Members are entitled to have any mistakes in their personal data rectified, and request restriction of our processing of personal data.

5. How to make a subject access request

If a member wishes to exercise their subject access right, the request should usually be made in writing. Written requests should usually be sent electronically to office@heloac.ac.uk

6. Our process on receipt of a subject access request

HELOA will acknowledge receipt of the subject access request, and take reasonable steps to verify the identity of the data subject. If the subject access request is made by someone other than the person the data is about, HELOA will check that they are authorised to make this request.

We will then work to retrieve and collate the requested held information.

We will respond to the subject access request within 30 days after receipt of identity verification, as required by the GDPR. If there are a number of requests, or the request is complex, we reserve the right to extend this deadline by a further two months.

We will provide a copy of the requested information free of charge, unless the request for personal information is found to be manifestly unfounded or excessive, or the data subject has made multiple requests, in which case we reserve the right to charge a reasonable fee to cover the administrative costs.

7. Our response to the requestor

After processing the subject access request, our response should include:

- The purpose(s) of the processing
- The categories of personal data concerned
- The recipients or categories of recipients to whom personal data has been or will be disclosed
- The envisaged period for which personal data will be stored, or, if not possible, the criteria used to determine that period
- The existence of the right to request rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing
- The right to lodge a complaint with the ICO
- If the data has not been collected from the data subject: the source of such data

8. Right to withhold personal data

HELOA may withhold some personal data from a data subject if disclosing it would adversely affect the rights and freedoms of others. This may mean selecting and redacting certain information which relates to others, rather than rejecting the entire subject access request.

9. Complaints

Where a data subject is not satisfied with a response to a subject access request, HELOA should manage this as a complaint. We must advise the requestor that if they remain unhappy with the outcome, they may [complain to the ICO](#).