



KASTANSTORY HOME CARE SERVICES LIMITED

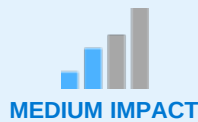
Petronne House, 31 Church Street, Dagenham, Essex, RM10 9UR



Review Sheet

Last Reviewed
19 Jul '23Last Amended
19 Jul '23Next Planned Review in 12 months, or
sooner as required.

Business impact



Changes are important, but urgent implementation is not required, incorporate into your existing workflow.

Reason for this review

Scheduled review

Were changes made?

Yes

Summary:

By law, people can ask for a copy of any information that is about them. This policy explains how to deal with subject access requests and the actions to be taken. It has been reviewed and updated to include information about verbal requests for personal data. The forms have been updated and the Template Subject Access Response Letter includes a section about pausing the request while waiting for further information or clarification. References have been checked and updated.

Relevant legislation:

- Data Protection Act 2018
- UK GDPR

Underpinning knowledge - What have we used to ensure that the policy is current:

- Author: Information Commissioner's Office, (2021), *Right of access*. [Online] Available from: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/right-of-access/> [Accessed: 19/7/2023]

Suggested action:

- Encourage sharing the policy through the use of the QCS App

Equality Impact Assessment:

QCS have undertaken an equality analysis during the review of this policy. This statement is a written record that demonstrates that we have shown due regard to the need to eliminate unlawful discrimination, advance equality of opportunity and foster good relations with respect to the characteristics protected by equality law.

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**1. Purpose**

1.1 To explain Subject Access Requests and to ensure that all staff at KASTANSTORY HOME CARE SERVICES LIMITED know how to recognise and deal with the receipt of a Subject Access Request.

1.2 To support KASTANSTORY HOME CARE SERVICES LIMITED in meeting the following Key Lines of Enquiry/Quality Statements (New):

Key Question	Key Lines of Enquiry	Quality Statements (New)
WELL-LED	W2: Does the governance framework ensure that responsibilities are clear and that quality performance, risks and regulatory requirements are understood and managed?	QSW5: Governance, management and sustainability

1.3 To meet the legal requirements of the regulated activities that {KASTANSTORY HOME CARE SERVICES LIMITED} is registered to provide:

- | Data Protection Act 2018
- | UK GDPR

**2. Scope**

2.1 The following roles may be affected by this policy:

- | All staff

2.2 The following Service Users may be affected by this policy:

- | Service Users

2.3 The following stakeholders may be affected by this policy:

- | Family
- | Advocates
- | Representatives
- | Commissioners
- | External health professionals
- | Local Authority
- | NHS

**3. Objectives**

3.1 This policy will assist with defining accountability and establishing ways of working in terms of responding to Data Subjects exercising their rights.

3.2 This policy will enable UK GDPR compliance at KASTANSTORY HOME CARE SERVICES LIMITED by ensuring that Subject Access Requests received from Data Subjects, including Service Users, are dealt with appropriately by staff and by Francis Quayson or nominated Privacy Manager, and other individuals with responsibility for UK GDPR compliance at KASTANSTORY HOME CARE SERVICES LIMITED.

3.3 This policy will facilitate the process of making a Subject Access Request for the benefit of Data Subjects, including Service Users.

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**4. Policy**

4.1 KASTANSTORY HOME CARE SERVICES LIMITED will ensure that the policy entries below are reviewed, understood and complied with by all staff. KASTANSTORY HOME CARE SERVICES LIMITED acknowledges that if its processes differ from those set out in the policy, it will modify them to the extent necessary to reflect the processes and procedures set out in this policy.

4.2 KASTANSTORY HOME CARE SERVICES LIMITED will ensure that they have appointed either a Data Protection Officer (DPO) if required to do so, or have specified who will be responsible for Data Protection within KASTANSTORY HOME CARE SERVICES LIMITED. Their name and contact details will be publicised so that staff know who to contact should any queries or Subject Access Requests be made.

KASTANSTORY HOME CARE SERVICES LIMITED will ensure that the details are kept up-to-date and that those up-to-date details are reflected in this policy and associated procedures. The Data protection Officer is Francis Quayson, whose contact details are 07915271137, f.quayson@kastanstoryhomecare.co.uk.

4.3 The DPO at KASTANSTORY HOME CARE SERVICES LIMITED must read and understand this policy and procedure and adhere to the Subject Access Request process every time a Subject Access Request is received.

4.4 KASTANSTORY HOME CARE SERVICES LIMITED understands that an individual is legally entitled to require an organisation to provide access to, including copies of, all of that individual's personal data held by the Organisation. This is known as a "Subject Access Request".

4.5 At a high level, personal data is any information which identifies a living individual or could be used to identify that person whether directly or indirectly. It includes first name and surname, email address, address, date of birth, medical and health records, Care Plans, photographs, CCTV images, right to work documentation, marriage certificates, National Insurance number, and political and religious views amongst others.

4.6 KASTANSTORY HOME CARE SERVICES LIMITED is not entitled to charge a fee to respond to the Subject Access Request (unless a person makes manifestly unfounded or excessive Subject Access Requests) or requests further copies of their personal data.

4.7 KASTANSTORY HOME CARE SERVICES LIMITED must respond to the Subject Access Request as soon as possible and no later than within one calendar month from the first day after the Subject Access Request was received. If the following month is shorter and there is no corresponding calendar date (e.g. the Subject Access Request is received on 31 May but there is no 31 June), the date for response is the last day of the following month (e.g. 30 June). If the corresponding date falls on a weekend or a public holiday, the response must be sent by the next working day.

KASTANSTORY HOME CARE SERVICES LIMITED acknowledges that it may be simplest to adopt a 28-day default response period so that it has a consistent approach to responding to Subject Access Requests throughout the year.

KASTANSTORY HOME CARE SERVICES LIMITED understands that it may be possible to extend the timeframe for responding to a Subject Access Request if the request is complex or if KASTANSTORY HOME CARE SERVICES LIMITED has received a number of requests from the Data Subject.

4.8 KASTANSTORY HOME CARE SERVICES LIMITED understands that whether a Subject Access Request is complex depends upon the specific circumstances of each case. KASTANSTORY HOME CARE SERVICES LIMITED understands that the following list provides examples of some factors that may add to the complexity of a Subject Access Request but they must be able to demonstrate why the Subject Access Request is complex based on the particular circumstances:

- | Technical difficulties in retrieving the information - for example if data is electronically archived
- | Applying an exemption that involves large volumes of particularly sensitive information
- | Clarifying potential issues around disclosing information about a child to a legal guardian
- | Specialist work involved in obtaining the information or communicating it in any intelligible form
- | Clarifying potential confidentiality issues around the disclosure of sensitive medical information to an authorised third party
- | Needing to obtain specialist legal advice

KASTANSTORY HOME CARE SERVICES LIMITED understands that requests that involve a large volume of information may add to the complexity of a request but should not be the sole reason for determining that a request is complex.

4.9 We understand that the Subject Access Request can be made to anybody in KASTANSTORY HOME

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CARE SERVICES LIMITED. It is therefore possible that any member of staff may receive a Subject Access Request on behalf of KASTANSTORY HOME CARE SERVICES LIMITED.

**5. Procedure****5.1 Template Subject Access Request Letter**

KASTANSTORY HOME CARE SERVICES LIMITED will consider providing the template letter of KASTANSTORY HOME CARE SERVICES LIMITED to Data Subjects, potentially via its website.

If KASTANSTORY HOME CARE SERVICES LIMITED provides the template letter, it will notify the Data Subjects that they are not obliged to use the template letter and that they may ask KASTANSTORY HOME CARE SERVICES LIMITED in writing by any means for access to their Personal Data. KASTANSTORY HOME CARE SERVICES LIMITED will also notify the Data Subjects that they do not need to use any particular form of words to make a Subject Access Request.

5.2 Subject Access Request Flowchart

Janine Galant will refer to the QCS Subject Access Request Flowchart for the correct management of Subject Access Requests. This flowchart can be located in the Forms section of this policy as well as in the QCS Resource Centre.

5.3 Process Map Stage 1 - Maintaining a log of Subject Access Requests

KASTANSTORY HOME CARE SERVICES LIMITED will maintain a log of the Subject Access Requests it receives, setting out the dates on which the requests are received and the final response sent, together with any intermediary steps taken before sending a final response (e.g. request for identification proof or further information in respect of the data).

If KASTANSTORY HOME CARE SERVICES LIMITED fails to respond to the request in accordance with UK GDPR timescales, this must also be noted together with an explanation of the failure and steps taken to avoid such failure in the future.

5.4 Process Map Stage 2 - Acknowledge Subject Access Request

KASTANSTORY HOME CARE SERVICES LIMITED acknowledges that it is best practice for KASTANSTORY HOME CARE SERVICES LIMITED to acknowledge receipt of the Subject Access Request.

5.5 Process Map Stage 3 - Confirmation of Identity

- | KASTANSTORY HOME CARE SERVICES LIMITED understands that it will only respond to a Subject Access Request if it is confident of the identity of the applicant
- | KASTANSTORY HOME CARE SERVICES LIMITED understands that it must be reasonable in terms of what it asks for and that it must not ask for a significant amount of extra information if the identity of the person making the request is obvious, which is more likely to be the case if KASTANSTORY HOME CARE SERVICES LIMITED has an ongoing relationship with that person. If, for example, an existing employee or Service User makes the request, KASTANSTORY HOME CARE SERVICES LIMITED acknowledges that it is likely it will be able to easily confirm their identity
- | If, however, KASTANSTORY HOME CARE SERVICES LIMITED receives a request from an individual it does not recognise or the individual's email address/postal address has changed since the last dealings with them, KASTANSTORY HOME CARE SERVICES LIMITED will consider seeking further proof of identity such as a recent utility bill or copy of a driving licence or passport
- | In this scenario, the one-month time period to respond will commence only once KASTANSTORY HOME CARE SERVICES LIMITED has received the proof of identity. KASTANSTORY HOME CARE SERVICES LIMITED will not delay in asking for further proof

5.6 Process Map Stage 4 - Asking for further information/clarification

- | KASTANSTORY HOME CARE SERVICES LIMITED understands that if it processes a large amount of information relating to the individual, it may ask the individual to specify the information or processing activities their request relates to and that the time limit for responding to the request is paused until KASTANSTORY HOME CARE SERVICES LIMITED receives clarification
- | KASTANSTORY HOME CARE SERVICES LIMITED understands that it should not seek clarification in all cases, but only where clarification is genuinely needed to respond to the request and KASTANSTORY HOME CARE SERVICES LIMITED processes a large amount of information about the individual
- | KASTANSTORY HOME CARE SERVICES LIMITED understands that it may also ask the individual to

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provide additional information about the information they want to receive, such as the context in which it may have been processed and the likely dates of processing. KASTANSTORY HOME CARE SERVICES LIMITED understands that a Data Subject is not obliged to narrow the scope of the request and KASTANSTORY HOME CARE SERVICES LIMITED must still comply with the request by making reasonable searches if the individual refuses to provide additional information or narrow own their request

- | KASTANSTORY HOME CARE SERVICES LIMITED will not delay in asking for further information and will be clear about what details are needed. Provided KASTANSTORY HOME CARE SERVICES LIMITED does that, and it needs the additional information in order to be able to comply (rather than it being a tactic to delay timescales), the one-month time period will begin when KASTANSTORY HOME CARE SERVICES LIMITED receives the information
- | KASTANSTORY HOME CARE SERVICES LIMITED understands that it should provide general confirmation that it processes personal data together with supplementary information about the processing as soon as possible and within one month of the request, irrespective of whether it requires further time to provide the majority of the Personal Data

5.7 Process Map Stage 5 - Considering whether any special cases apply - social work data

KASTANSTORY HOME CARE SERVICES LIMITED will consider whether any of the personal data constitutes "social work data" which is personal data processed by certain bodies in connection with their social services functions or to provide social care but is not education data or health data.

Social work data is exempt from the right of access if it is:

- | Processed by a court
- | Supplied in a report or given to the court as evidence in the course of proceedings; and
- | Certain statutory rules apply to those proceedings that allow the withholding of the data from the individual

If KASTANSTORY HOME CARE SERVICES LIMITED thinks that this exemption may apply, it should seek further legal advice.

KASTANSTORY HOME CARE SERVICES LIMITED will consider whether disclosure of personal data would go against an individual's expectations and wishes where the Subject Access Request is received from someone:

- | With parental responsibility for an individual aged under 18; or
- | Appointed by the court to manage the affairs of an individual who is incapable of managing their own affairs

KASTANSTORY HOME CARE SERVICES LIMITED understands that the exemption only applies to the extent that complying with the request would disclose information that:

- | The individual provided to KASTANSTORY HOME CARE SERVICES LIMITED in the expectation that it would not be disclosed to the requester, unless the individual has since expressly indicated that they no longer have that expectation
- | Was obtained as part of an examination or investigation to which the individual consented in the expectation that the information would not be disclosed in this way, unless the individual has since expressly indicated that they no longer have that expectation; or
- | The individual has expressly indicated should not be disclosed in that way

KASTANSTORY HOME CARE SERVICES LIMITED will consider whether disclosure of the personal data could cause serious harm to the physical or mental health of any individual.

5.8 Process Map Stage 6 - Considering whether any special cases apply - health data

KASTANSTORY HOME CARE SERVICES LIMITED will consider whether any of the personal data constitutes "data concerning health" which is personal data relating to the physical or mental health of an individual, including the provision of health care services, which reveals information about their health status.

Health data is exempt from the right of access if:

- | It is processed by a court
- | It is supplied in a report or given to the court as evidence in the course of proceedings; and
- | Certain statutory rules apply to those proceedings that allow the withholding of the data from the

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individual

If KASTANSTORY HOME CARE SERVICES LIMITED thinks that this exemption may apply, it should seek further legal advice.

KASTANSTORY HOME CARE SERVICES LIMITED will consider whether disclosure of personal data would go against an individual's expectations and wishes where the Subject Access Request is received from someone:

- | With parental responsibility for an individual aged under 18; or
- | Appointed by the court to manage the affairs of an individual who is incapable of managing their own affairs

KASTANSTORY HOME CARE SERVICES LIMITED understands that the exemption only applies to the extent that complying with the request would disclose information that:

- | The individual provided to KASTANSTORY HOME CARE SERVICES LIMITED in the expectation that it would not be disclosed to the requester, unless the individual has since expressly indicated that they no longer have that expectation
- | Was obtained as part of an examination or investigation to which the individual consented in the expectation that the information would not be disclosed in this way, unless the individual has since expressly indicated that they no longer have that expectation; or
- | The individual has expressly indicated should not be disclosed in that way

KASTANSTORY HOME CARE SERVICES LIMITED will consider whether disclosure of the personal data could cause serious harm to the physical or mental health of any individual. KASTANSTORY HOME CARE SERVICES LIMITED may rely on the "serious harm test" to withdraw data if:

- | It is a health professional; or
- | Within the last 6 months it has obtained an opinion from the appropriate health professional that the serious harm test for health data is met

If KASTANSTORY HOME CARE SERVICES LIMITED is not a health professional, it must not disclose health data in response to a Subject Access Request unless:

- | Within the last 6 months it has obtained an opinion from the appropriate health professional that the serious harm test for health data is not met; or

- | It is satisfied that the individual it is about has already seen or knows about the health data.

If KASTANSTORY HOME CARE SERVICES LIMITED needs to consult with a health professional it may consider the request to be complex

5.9 Process Map Stage 7 - Considering whether Subject Access Requests may be manifestly unfounded or excessive

KASTANSTORY HOME CARE SERVICES LIMITED may be able to refuse to comply with a Subject Access Request (or charge a fee to respond to the request) if it is manifestly unfounded or manifestly excessive.

A Subject Access Request may be manifestly unfounded if:

- | The individual has no intention to exercise their right of access; or
- | The request is malicious in intent and is being used to harass an organisation with no real purpose other than to cause disruption

A Subject Access Request may be manifestly excessive if it is clearly or obviously unreasonable, bearing in mind the proportionality of the Subject Access Request compared with the burden or costs involved in dealing with the request.

5.10 Process Map Stage 8 - Gathering information

- | Collating all relevant information will be the most time-consuming task. KASTANSTORY HOME CARE SERVICES LIMITED will consider which departments may hold personal data and whether that personal data can be accessed centrally by one individual or team
- | The fewer people who are involved in locating the data, the less impact it will have on the day-to-day business of KASTANSTORY HOME CARE SERVICES LIMITED
- | KASTANSTORY HOME CARE SERVICES LIMITED will consider how to search for the data. For example, does the Data Subject use a nickname or alternative name which would also need to be searched?
- | KASTANSTORY HOME CARE SERVICES LIMITED understands that documents or files may contain a

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mixture of information that is Personal Data, Personal Data relating to other people and information that is not Personal Data at all. In relation to Personal Data relating to other individuals, KASTANSTORY HOME CARE SERVICES LIMITED will need to either seek consent from the other individual to disclosing their Personal Data or determine that it is otherwise reasonable to disclose their Personal Data. In relation to non-Personal Data, KASTANSTORY HOME CARE SERVICES LIMITED may find it easier (and it may be more helpful to the individual) to disclose a combination of Personal Data and ordinary information if that information is not sensitive or contentious

5.11 Process Map Stage 9 - Does an exemption apply?

There are a number of exemptions that apply that may entitle KASTANSTORY HOME CARE SERVICES LIMITED to withhold personal data when responding to a Subject Access Request. KASTANSTORY HOME CARE SERVICES LIMITED understands that the following is a very brief summary of the exemptions. KASTANSTORY HOME CARE SERVICES LIMITED should seek legal advice if it believes any of the exemptions may be relevant:

- | Crime and taxation
- | Legal professional privilege
- | Functions designed to protect the public
- | Regulatory functions relating to legal services, the health service and children's services
- | Judicial appointments, independence and proceedings
- | Journalism, academia, art and literature
- | Research and statistics
- | Archiving in the public interest
- | Health, education and social work data
- | Child abuse data
- | Management information
- | Negotiations with the requester
- | Confidential references
- | Exam scripts and exam mark

5.12 Process Map Stage 10 - Disclosure of a third party individual's personal data

If personal data relating to other individuals is included in the documents that will be provided pursuant to the Subject Access Request, it will need to be redacted unless KASTANSTORY HOME CARE SERVICES LIMITED obtains consent from the Data Subject to disclose the Personal Data or otherwise determines that it is reasonable to disclose the third party individual's Personal Data. When considering whether it is reasonable to disclose the third party individual's Personal Data, KASTANSTORY HOME CARE SERVICES LIMITED will consider:

- | The type of information that would be disclosed
- | Any duty of confidentiality owed to the third party (for example, in an employee/employer relationship or confidentiality owed to the Service User)
- | Any steps taken by KASTANSTORY HOME CARE SERVICES LIMITED to try to get the third party's consent
- | Whether the third party is capable of giving consent
- | Any refusal of consent by the third party
- | Whether the Personal Data relates to a health worker or social care worker (this can often be disclosed without consent, but KASTANSTORY HOME CARE SERVICES LIMITED will confirm this is on a case by case basis)

5.13 Process Map Stage 11 - Incorporate additional information into response

In some cases, the Data Subject may only request a copy of his or her personal data. They are entitled, however, to also request the following information:

- | The purposes of and legal basis for the processing
- | The categories of personal data that are processed
- | The recipients or categories of recipients to whom the personal data has been disclosed (including

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recipients or categories of recipients in third countries or international organisations)

- | The period for which it is envisaged that the personal data will be stored or, where that is not possible, the criteria used to determine the retention period
- | The existence of the Data Subject's rights to request:
 - | Rectification of personal data; and
 - | Erasure of personal data or the restriction of its processing
- | The existence of the Data Subject's right to lodge a complaint with the Information Commissioner's Office and the contact details of the Information Commissioner's Office
- | Communication of the personal data undergoing processing and any information about its origin
- | Appropriate safeguards in place for any transfers of their personal data out of the UK

If the above information is requested in the Subject Access Request, or if the Subject Access Request does not expressly state that the individual does not require confirmation of the information above, it must be provided. The information should be included in the relevant privacy policy so it may be simplest to provide a further copy of the privacy policy.

5.14 Process Map Stage 12 - Send response to Data Subject

KASTANSTORY HOME CARE SERVICES LIMITED will send its response to the Data Subject.

KASTANSTORY HOME CARE SERVICES LIMITED will consider keeping a copy of the information provided to the Data Subject until it receives confirmation from the Data Subject that it does not require any further information, or for a period of 6 months from completion of the request, whichever happens first.

5.15 Training

KASTANSTORY HOME CARE SERVICES LIMITED will circulate this policy to all staff and consider whether providing training to staff in respect of Subject Access Requests and this policy would be beneficial.

**6. Definitions****6.1 Special Categories of Data**

- | Special categories of data are more sensitive than other types of personal data and include but are not limited to medical and health records and Care Plans (including information collected as a result of providing health care services) and information about a person's religious beliefs, ethnic origin and race, sexual orientation and political views

6.2 Process or Processing

- | Doing anything with personal data, including but not limited to collecting, storing, holding, using, amending or transferring it. An organisation does not need to be doing anything actively with the personal data - at the point it collects it, it is processing it

6.3 Personal Data

- | Any information that identifies, or can identify, a living person including but not limited to names, email addresses, postal addresses, job roles, photographs, CCTV and special categories of data

6.4 Data Subject

- | The individual to whom personal data processed by KASTANSTORY HOME CARE SERVICES LIMITED relates

6.5 Data Protection Act 2018

- | The Data Protection Act 2018 is a United Kingdom Act of Parliament that updates data protection laws in the UK. It sits alongside the General Data Protection Regulation and implements the EU's Law Enforcement Directive

6.6 UK GDPR

- | The UK GDPR is the retained EU law version of GDPR that forms part of English law



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Key Facts - Professionals

Professionals providing this service should be aware of the following:

- ▮ All staff at KASTANSTORY HOME CARE SERVICES LIMITED will follow the guidelines set out in this policy to ensure that Subject Access Requests are dealt with appropriately and in compliance with UK GDPR
- ▮ Data Subjects can use the template request letter provided in the Forms section of this policy or can request data in writing in other means. All Subject Access Requests must be responded to, irrespective of the form of communication. Requests for Access should not be ignored even if they are made verbally - there is no legal requirement for them to be in writing



Key Facts - People affected by the service

People affected by this service should be aware of the following:

- ▮ If a Data Subject, including the Service User, wishes to make a Subject Access Request to KASTANSTORY HOME CARE SERVICES LIMITED, they can use the template request letter provided. They do not have to use the template request letter and can instead make the Subject Access Request in writing by any other means or verbally. However, it is clearer to have the request in writing



Further Reading

As well as the information in the 'underpinning knowledge' section of the review sheet we recommend that you add to your understanding in this policy area by considering the following materials:

ICO - How to Deal with a Request for Information - A Step-by-Step Guide:

<https://ico.org.uk/for-organisations/sme-web-hub/how-to-deal-with-a-request-for-information-a-step-by-step-guide/>



Outstanding Practice

To be 'outstanding' in this policy area you could provide evidence that:

- ▮ KASTANSTORY HOME CARE SERVICES LIMITED creates a detailed log for UK GDPR compliance, including a log of all information relevant to Subject Access Requests received
- ▮ The wide understanding of the policy is enabled by proactive use of the QCS App
- ▮ KASTANSTORY HOME CARE SERVICES LIMITED provides training to all staff to ensure that they understand how to recognise and deal with a Subject Access Request



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Forms

The following forms are included as part of this policy:

Title of form	When would the form be used?	Created by
Template Subject Access Request Letter - GDPR05	For a Data Subject to submit a Subject Access Request	QCS
Template Subject Access Response Letter - GDPR05	This form can be used by each organisation as an initial response/acknowledgement to a subject access request. Each organisation should consider seeking legal advice if they wish to extend the deadline for responding to the request	QCS
Subject Access Request Flowchart - GDPR05	To be used to guide the manager with decision making when a Subject Access Request is made.	QCS

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Francis Quayson, Data protection Officer
KASTANSTORY HOME CARE SERVICES LIMITED
Petronne House
31 Church Street
Dagenham
Essex
RM10 9UR

Date:

Dear Francis Quayson

Subject Access Request under UK General Data Protection Regulation 2021

I am writing to make a Data Subject Access Request pursuant to the UK General Data Protection Regulation 2021.

Scope of Request

[This is a general request that relates to any personal data processed about me by or on behalf of KASTANSTORY HOME CARE SERVICES LIMITED].

[OR]

I only require information in respect of the following:

[Insert any information you think would help us to find what you are seeking, or let us know if there is something in particular you require or whether you require us to search within specific dates (for example)]

[Locating the data]

[Please only provide documents and emails that were created and/or sent between [Insert date range].]

[Please only provide emails that were sent between [Insert names].]

Yours sincerely,

[Please enter your full name]

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[Data subject name/requester name]
[Address]
Date:

Dear [Data subject name/requester name]

Response to your Subject Access Request dated [insert date of request]

We write in relation to your Subject Access Request.

[We are reviewing your request and intend to respond to you within one month of the date we received your request, i.e. [insert date by which response needs to be sent]. If we need any further information from you in the meantime, we will let you know.]

[OR]

[We have determined that your request constitutes a complex request for the purposes of UK GDPR. Our rationale for such decision takes into account: [Insert list of factors that make request complex]. This entitles us to extend the deadline for response by a further 2 months, i.e. 3 months from the date we received your request. We will therefore aim to have provided all information to you by [Insert extended date for request]. To the extent we are able to provide you with elements of your personal data prior to that date, we will do so.]

[OR]

[On the basis that you have made a number of repeated requests to us with respect to your personal data, we are entitled to extend the deadline for response by a further 2 months, i.e. 3 months from the date we received your request. We will therefore aim to have provided all information to you by [Insert extended date for request]. To the extent we are able to provide you with elements of your personal data prior to that date, we will do so.]

[AND/OR]

[We process a large amount of information about you and it is not clear from your request what information you are asking for. In order to provide you with the personal data you require as efficiently as possible, we would be grateful if could please consider narrowing the scope of your request by, for example, [telling us of specific matters that you are interested in with respect to your personal data, providing us with date ranges of the emails or other personal data you wish to be searched], [providing a list of recipients/senders of emails that you wish to be searched], [providing us with key terms that you wish to be searched], [limiting your request to the search of certain systems or locations].

The time for us to respond to your request will now be paused and will restart from the date that we receive your response.
Yours sincerely

[Insert Francis Quayson/privacy officer name or similar]
KASTANSTORY HOME CARE SERVICES LIMITED

