



Cognisco Ltd

Subject Access Request Procedure

Scope

All personal data processed by Cognisco Ltd is in scope of this procedure. This procedure excludes personal data that is asked for as a matter of routine standard services offered by Cognisco Ltd - such as when it is part of the agreement with the customer.

SAR Overview

A SAR request can be made by Data subjects who understand that Cognisco Ltd is processing any personal data about that individual. Cognisco Ltd will respond within GDPR regulations (currently one month from receipt).

The initial SAR request is free of charge. Cognisco Ltd may charge a 'reasonable fee' for any additional requests if they are deemed manifestly unfounded, excessive or repetitive. Cognisco Ltd may also extend the response time by a further two months where requests are complex or numerous. If this is the case the individual will be inform within a month from the initial request.

Responses

SAR responses will contain a description of the personal data which Cognisco Ltd hold; the purpose of processing, details of which staff have access to the data, the source of the data.

Responsibilities

The (Data Protection Officer / GDPR Owner) is responsible for handling all SARs, maintaining the procedure and ensuring GDPR compliance.

Procedure

- Subject Access Requests must be made using PIMS14. Subject Access Request Form then logged into the PIMS14 SAR log.
- PIMS14 requires identity confirmation, in the form of a current passport/driving license, and the signature on the identity must be cross-checked to that on the application form.
- The date will be recorded and has one month from this date to provide the requested information or a reasonable explanation that Cognisco Ltd will be extending the response time to three months due to the complex nature of the request.

- Applications are sent to the (Data Protection Officer / GDPR Owner). The (Data Protection Officer / GDPR Owner) is responsible for ensuring the SAR is processed within the GDPR regulations.
- The (Data Protection Officer / GDPR Owner) is responsible for ensuring all company data is reviewed against the SAR request. This may include searching all databases, all relevant filing systems (manual files) in Cognisco Ltd, including all back up and archived files, whether computerised or manual, all e-mail folders and archives.
- The (Data Protection Officer / GDPR Owner) maintains a data map that identifies where all data in Cognisco Ltd is stored.
- The (Data Protection Officer / GDPR Owner) maintains a record of requests.
- The (Data Protection Officer / GDPR Owner) is responsible for reviewing all provided documents to identify whether any third parties are processing data linked to the SAR request.
- Information that may be excluded from the SAR responses - Crime prevention and detection, Negotiations with the requester, Management forecasts, Confidential references, Information used for research or historical or statistical purposes, Information covered by legal professional privilege.
- The SAR response may be provided to the data subject in electronic format, paper format or a reasonable format.
- The electronic formats used for responses to SARs are CSV or pdf.

This document is reviewed periodically and at least annually to ensure compliance with the following prescribed criteria.

- General Data Protection Regulation.
- Legislative requirements defined by law, where appropriate.