



Data Subject Access Request (DSAR) Procedures



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Document Control

Document Overview

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Document Approval

The Chief Operating Officer shall review this policy annually and shall determine whether any further changes need to be made prior to approval. Initial release and significant changes require approval from the board.

This Policy was approved by Andy Mackey, Chief Operating Officer on 25th February 2025 and is issued on a version-controlled basis under his signature.

Document History

Date of Change	Summary of Change	New Version Number	Changes to be notified to:
25/02/25	Annual Review	V3.0	COO



Data Subject Access Request (DSAR) Procedure

The General Data Protection Regulation

The General Data Protection Regulation (GDPR) was brought into EU law in May 2016 and became enforceable on 25th May 2018. The GDPR is a European regulation which means it automatically applies to all Member States. The UK have supported this by introducing the Data Protection Act 2018.

GDPR entitles individuals to request access to any personal data that EPM Ltd is holding about them. This is known as a 'Data Subject Access Request.' This document provides guidance to employees on making a Data Subject Access Request (DSAR) and to what happens in processing DSAR's.

A DSAR is where an individual, using their rights under GDPR, makes a request for a copy of the personal data an organisation holds on them, or details of what data is held and its source. A DSAR does not have to reference GDPR, the term "Data Subject Access Request" or reference any legislative rights. However, it does have to be a written request to be valid (however, reasonable adjustments may be made at the Data Protection Officer's discretion were dealing with accessibility issues).

The Process

All DSAR's must be made in writing to EPM Ltd.'s Data Protection Officer at the address below. Where a request is received from elsewhere in the business, the Data Protection Officer should be immediately informed so they can deal with the request with no undue delay.

Once the request is received the Data Protection Officer will confirm the identity of the subject and assess the scope of the request. Once the identity of the data subject (or the right/authority to request the data where the data subject is not the requester) the Data Protection Officer will begin the process of contacting the appropriate departments to collect and collate the information. In order to locate the correct information within EPM Ltd, the Data Protection Officer may ask the subject to confirm exactly what information they are requesting, or where they believe the information may be stored.

The information provided in reply to a request must be that which EPM Ltd holds (subject to any exemptions) at the time the request is received. However, the Act allows routine updating and maintenance of the data to continue between the date on which the request is received and the date when the reply is dispatched. This means that the information provided to the individual may differ from that which was held at the time when your request was received, but only because of normal processing. Data cannot be deleted.

The Data Protection Officer will contact any third parties (e.g. authors of e-mails/letters contained within the file) in order to obtain consent to disclose the information to the subject. Where consent cannot be obtained or is denied the Data Protection Officer will consider the reasons and EPM's duty of care to both parties as specified in the GDPR to decide whether to disclose the information. Where the information contains reference to third parties the Data Protection Officer will redact (blank out) the third parties. Where this is impossible and consent from the third party has not been received the information will not be disclosed.



All requests will be dealt with within one calendar month of receipt (minus any time spent verifying identity or authorisation to act on the subject's behalf). The information will be dispatched to the subject as soon as the above process is complete.

Contacts & Complaints

Any enquiries regarding this procedure or EPM's Data Protection Policies should be directed to:

Data Protection Officer
EPM Ltd.
Spencer House,
Spitfire Close,
Ermine Business Park,
Huntingdon
PE29 6EP

dpo@epm.co.uk

If you require more information about the General Data Protection Regulation, the Data Protection Act 2018, or are unhappy with the way EPM has dealt with your request please contact:

The Information Commissioner

End