

## **CIPS Group**

# **CIPS Guidelines for making a Subject Access Request**

THIS IS FOR EXTERNAL USE

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## 1 Rights of access

Information regarding your rights can be found on [CIPS Privacy Statement](#).

You may request details of personal information which we hold about you under the Data Protection Act 2018 and the General Data Protection Regulation. The process for submitting such requests is outlined in this guidance note.

## 2 What you are entitled to

You are entitled to receive confirmation whether personal data about you is being held and, where applicable, to:

- have any inaccuracies with the personal data held corrected
- a description of the categories of personal data concerned
- information on how your personal data is used (purposes for processing)
- be told of the recipients or categories of recipients that your personal data is shared with and where they are based outside of the EU, to be told of the safeguards in place to keep your data secure
- be informed of how long your personal data will be stored for or the criteria used to assess this
- be provided with information on the source of your personal data (where we haven't collected it directly from you)
- be informed of the existence of automated decision-making and profiling, and to guidance on the logic used and the predicted impact on you

## 3 Checking your identity

Before we provide the personal data to you we must be satisfied that you are entitled to it. This is to ensure that we do not disclose personal information to the wrong person. As such, we ask that you include information that will help us to confirm your identity when you submit your request.

If someone is making a request on your behalf, then in addition to this information we will require a written authorisation signed by you and evidence that it is a genuine request, e.g. proof of their relationship to you.

## 4 Making a request for your personal information

Application for the information that you are entitled to is referred to as a **Subject Access Request**. This is generally free of charge, however where a request is unfounded or excessive, or you ask for further copies of the same information, then we have the option to charge a reasonable fee based on the administrative cost of providing the information or, alternatively, we can refuse your request. Each request will be assessed on a case by case basis.

Under GDPR you are permitted to submit your request verbally or in writing, however to increase the likelihood that we receive the information needed to provide a response, we encourage you to use the Subject Access Request form that we have available on our website.

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This can be sent by email or post to:

Email: [dataprotection@cips.org](mailto:dataprotection@cips.org)

Data Protection Response Team  
CIPS  
Easton House  
Easton on the hill  
Stamford  
PE9 3NZ

Please provide as much detail as possible to help us find the information you are seeking. The more details you can provide, the more likely we are to be able to find the information you seek. If we do not have enough details then we will contact you to help us answer your request.

## 5 When you will receive a response

We will acknowledge your request as soon as it has been received and will subsequently provide the information you have asked for within at least one month of the date your request is received or from the date where we receive additional information needed to verify your identity and/or locate the details you have asked for.

For complex or numerous requests, we are able to extend this period by a further two months. If the request is complex, then we will always contact you within one month of the receipt of your request to clarify the scope of your request, get further details about your request and explain why the extension is necessary.

## 6 What happens if we are unable to provide you with all the information you have requested?

There are special circumstances where it would not be appropriate to share personal data, referred to as Exemptions. Primarily these will apply where we process such data to meet a range of legal and regulatory responsibilities, for example, if personal details were disclosed in the course of a contract negotiation then that would not be fair on the parties. The confidentiality of this disclosure should not be compromised.

We will always consider these on a case by case basis and explain if any of these apply.

Examples include:

- Criminal investigations and national security
- Processing of employee data to meet tax or PAYE requirements
- Legal advice and proceedings
- Regulatory proceedings

In addition, we may not be able to disclose the personal data requested if it also relates to another identifiable individual, although where possible we will opt to redact such data.

In all cases, we will always explain to you the reasons why we are unable to adhere to your request (be it partially or in full) and remind you of your right to raise a complaint with the Information Commissioner (UK's supervisory authority for data protection).

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**Contact Details**

Please address requests and questions about this process or any other question about how we handle personal data under our privacy policy to [dataprotection@cips.org](mailto:dataprotection@cips.org).

**Guidelines last reviewed**

5<sup>th</sup> June 2018