



## Subject Access Request Policy

### Introduction

CM Security Limited (“us” or “we”) take our responsibilities with regard to the management of the requirements of the Data Protection Act 1998 (“the Act”) very seriously. This document provides the policy framework through which Subject Access Requests can be submitted.

### 1. Purpose

To establish a procedure for handling Subject Access Requests and to ensure that they are dealt with adequately and within the 40-day time limit.

### 2. Scope

This policy applies to all CM Security staff members.

### 3. Policy

The Act gives you the right to see all information of which you are the Data Subject and which comprises your Personal Data that we process. For information to be your Personal Data you have to be identifiable from the data and you should also be the focus of it.

In order to get a copy of this information, you need to submit a written Subject Access Request (see **Appendix 1**) which will provide sufficient information to identify you and establish what information you are seeking.

When we receive a Subject Access Request we will first check that we have enough information to be sure of your identity. Often, we will have no reason to doubt a person’s identity, for example, if we have regularly corresponded with them. However, if we have good cause to doubt your identity we can ask you to provide any evidence we reasonably need to confirm your identity.

We will then gather any manual or electronically held information (including emails). You are not entitled to see information about third-parties, so we will either remove/anonymise all references to third-parties or contact them to obtain their consent for us to disclose their information to you.

Under the Act, we are permitted to charge a maximum fee of £10. If we do charge a fee we will inform you promptly of this.



Once we have received all the information necessary to identify you, to identify the information requested and any fee required, we will then either provide you with hard copies and electronic copies of the information or an explanation why we are unable to provide the information. This process will take up to forty (40) days but in many cases, it will be possible to respond sooner, and we will aim to do so where possible. Failure to fully comply with legitimate requests within 40 days is a breach of the Act.

#### 4. Terms and Definitions

##### 4.1 Personal Data

Personal Data is any information relating to an identifiable living person who can be directly or indirectly identified in particular by reference to an identifier. Typical examples include names, addresses and telephone numbers.

##### 4.2 Subject Access Request

You are entitled to be told if we hold any Personal Data about you and, if so:

- be given a description of the data;
- to be told for what purposes the data are processed;
- to be told the recipients or the classes of recipients to whom the data may have been disclosed.

You are also entitled

- to be given a copy of the information with any unintelligible terms explained;
- to be given any information available to the controller about the source of the data.

## **Appendix 1: Subject Access Request Form**

You can use this form to request access to the personal information held on you by CM Security Limited (“us” or “we”). Under the Data Protection Act (1998) you have a right to be told whether we – or someone else on our behalf – is processing your Personal Data and, if so, to be given a description of:

- the Personal Data held;
- the purposes for which that Personal Data is being processed;
- those to whom that Personal Data is being or may be disclosed.



You should describe the information you need as clearly as possible: it is not sufficient to ask for "everything about me". If your request is too broad or unclear, we may need to ask you to be more specific.

Please return your completed Subject Access Request form to:

**Chief Information Officer**

**CM Security Ltd**

**DALTON HOUSE**

**60 Windsor Avenue**

**London**

**SW192RR**

Our aim is to respond to all requests within forty (40) days. If you need any further advice, please email us at:

[cio@cmsecurity.co.uk](mailto:cio@cmsecurity.co.uk)

**Section 1 of 3 – Your Details**

Surname:	
First Name(s):	
Address:	
Telephone:	
Email:	



### **Section 2 of 3 – Declaration**

I am the data subject named in Section One of this form and request that CM Security Limited provide me with a copy of the Personal Data of which I am the subject.

Signed: \_\_\_\_\_

Date: \_\_\_\_\_

### **Section 3 of 3 – Your Request**

Please provide a description of the data you are requesting in the box below. You may continue overleaf if needed. You should describe the information you need as clearly as possible: it is not sufficient to ask for "everything about me". If your request is too broad or unclear, we may need to ask you to be more specific.

