



General Data Protection Regulations (GDPR) Subject Access Request (SAR) Procedure

A SAR does not need to mention GDPR or use the phrase Subject Access Request. Any written request for personal data, including by email, must be treated as a SAR.

1. Responsibilities Before a SAR is received

Yalding Parish Council (YPC) **MUST**:

- Inform data subjects of their right to access data and provide an easily accessible mechanism through which such a request can be submitted
- Maintain a SAR policy and ensure internal procedures are accurate and complied with, including responsibilities, timing, changes to data and handling requests for rectification, erasure or restriction
- Ensure personal data is easily accessible to support timely responses
- Ensure The Clerk maintains a SAR log including dates, actions taken, exemptions applied and the final outcome
- Implement standard response formats where possible

2. Actions upon receipt of a SAR

YPC **MUST**:

- Verify whether YPC is the controller of the requested data. If not, refer the requester to the correct controller
- Verify the identity of the data subject
- Verify the access request and seek clarification if unclear
- Assess whether the request is unfounded or excessive. SARs are free unless manifestly unfounded or excessive
- Acknowledge receipt promptly and inform the requester of any applicable fees

- Confirm whether YPC processes the data. If no data is held, inform the requester
- Ensure data is not altered or destroyed as a result of the SAR
- Check for third party data and redact or obtain consent as required

3. Responding to a SAR

Requests for rectification, erasure or restriction will be handled in accordance with UK GDPR and responded to within one month.

YPC **MUST**:

- Respond within one month of receiving the SAR. Extensions of up to two months may be applied for complex requests
- Provide electronic responses where the SAR was submitted electronically
- Include the following information if data is processed:
 - Purposes of processing
 - Categories of personal data
 - Recipients or categories of recipients, including international transfers and safeguards
 - Retention periods or criteria for determining them
 - Rights to rectification, erasure, restriction or objection
 - Right to lodge a complaint with the Information Commissioner's Office.
 - Source of the data if not collected from the data subject
 - Confirmation that YPC does not carry out automated decision making or profiling
 - Provide a copy of the personal data undergoing processing.

Sample Letters

Yalding Parish Council **MUST** include the information in bullet 3 in all the letters:

Template Letters:

Appendix 1 Replying to a SAR providing the requested personal data

Appendix 2 Replying with the release of part of the personal data, when the remainder is covered by an exemption

Appendix 3 Replying to a SAR explaining why you cannot provide any of the requested personal data

Adopted on 03 March 2026

To be reviewed annually at the Annual Parish Council Meeting (see minutes of that meeting).

APPENDIX A

Replying to a subject access request providing the requested personal data

Typed on Parish Council Letterhead

Dear [Name of Data Subject]

Re: Data Protection Subject Access Request

Thank you for your letter of [date] making a data subject request for [subject]. We are pleased to enclose the personal data you requested.

Copyright in the personal data you have been given belongs to Yalding Parish Council, or to another party. Copyright material must not be copied, distributed, modified, reproduced, transmitted, published or otherwise made available in whole or in part without the prior written consent of the copyright holder.

Kind regards

Yours sincerely

Clerk to Yalding Parish Council

APPENDIX B

Release of part of the personal data when the remainder is covered by an exemption.

Typed on Parish Council letterhead

Dear [Name of Data Subject]

Re: Data Protection Subject Access Request

Thank you for your letter of [date] making a data subject request for [subject]. To answer your request, we asked the following areas to search their records for personal data relating to you:

[list the areas]

I am pleased to enclose [some/most] of the personal data you requested. [If any personal data has been removed] We have removed any obvious duplicate personal data that we noticed as we processed your request, as well as any personal data that is not about you. You will notice that [if there are gaps in the document] parts of the document(s) have been blacked out. [OR if there are fewer documents enclosed] I have not enclosed all of the personal data you requested. This is because [explain why it is exempt].

Copyright in the personal data you have been given belongs to Yalding Parish Council, or to another party. Copyright material must not be copied, distributed, modified, reproduced, transmitted, published, or otherwise made available in whole or in part without the prior written consent of the copyright holder.

Kind regards

Yours sincerely

Clerk to Yalding Parish Council

APPENDIX C

Replying to a subject access request explaining why you cannot provide any of the requested personal data

Typed on Parish Council Letterhead

Dear [Name of Data Subject]

Re: Data Protection Subject Access Request

Thank you for your letter of [date] making a data subject request for [subject].

I regret that we cannot provide the personal data you requested. This is because [explanation where appropriate].

[Examples include where one of the exemptions under the data protection legislation applies. For example, the personal data might include personal data is “legally privileged” because it is contained within legal advice provided to the council or relevant to on-going or preparation for litigation. Other exemptions include where the personal data identifies another living individual or relates to negotiations with the data subject. If the council is going to rely on the exemption to withhold or redact the data disclosed to the individual, then in this section of the letter the council should set out the reason why some of the data has been excluded.]

Kind regards

Yours sincerely

Clerk to Yalding Parish Council