

IEC's Subject Access Request Procedure

Introduction:

The protection of one's personal data is an EU fundamental right for all individuals. IEC, as a data controller, is obliged to ensure that the data it collects is obtained in a fair and transparent manner, stored securely, and is not retained for any longer than is necessary for the purpose of its collection or than the period outlined in the College's data retention periods.

Complementing this fundamental right of individuals is their right of access of information that is retained about them by a data controller. This allows an individual transparency regarding the kinds of data that is processed about them, and to verify that the information is accurate and up to date.

Rationale:

Under the Data Protection Acts (1988 and 2003), individuals have the right to ascertain if an organisation holds personal data about them (Section 3 of the Acts) and, if an organisation does, to apply for a copy of their personal data (Section 4 of the Acts). The General Data Protection Regulation builds on the requirements outlined of the Acts. This procedure is also informed by this new regulation.

Furthermore, this document is intended to detail the procedure that IEC will follow in the event that an individual exercises a subject access request in either of the above scenarios.

Scope:

This document outlines the procedure that IEC staff will implement, with the goal of providing an individual with the data required from a subject access request.

This policy should be read in conjunction with the associated Data Protection Policy, Data Risk Avoidance Procedure, and the Data Retention Periods List.

Procedure to clarify if IEC holds personal data about an individual:

An individual is entitled to make a formal application to IEC, asking if IEC holds any personal information about them. This request is limited to just clarifying if data is held or not and a description of the personal data, and does not include details of the type or scope of the data held, if that is the case. There is **no fee** for this request.

The procedure for making such an application is outlined below.

Procedure	Output
1. Formal, written application is made to the designated person in charge for Data Protection. This form of this application can be sent via email to info@ibcollege.com	Written application
2. IEC will respond in 21 days from the date it receives this request with confirmation and a description of the personal data held, if this is the case	Confirmation communication

Procedure to access a copy of personal data held by IEC:

An individual is entitled to make a formal application to IEC, asking for a copy of any personal data held about them. The outcome of this request is to provide a full copy of the personal data that IEC retains about an individual. Specifically, the following will be provided to the individual:

- A copy of their personal data
- The purposes for processing the data.
- The categories of personal data concerned.
- To whom the data has been or will be disclosed.
- Whether the data has been or will be transferred outside of the EU.
- The period for which the data will be stored, or the criteria to be used to determine retention periods.
- The right to make a complaint to the Data Protection Commissioner.
- The right to request rectification or deletion of the data.
- Whether the individual has been subject to automated decision making.

There is **no fee** for this request.

The procedure for making such an application is outlined below.

Procedure	Output
1. Formal, emailed application is made to info@ibcollege.com to the designated person in charge for Data Protection.	Written application
2. IEC will respond in 28 days from the date it receives this request with the following information: <ul style="list-style-type: none">• A copy of their personal data• The purposes for processing the data.• The categories of personal data concerned.• To whom the data has been or will be disclosed.• Whether the data has been or will be transferred outside of the EU.• The period for which the data will be stored, or the criteria to be used to determine retention periods.• The right to make a complaint to the Data Protection Commissioner.• The right to request rectification or deletion of the data.• Whether the individual has been subject to automated decision making.	A copy of personal information held in either printed, oral or electronic format as per the data subject's preference