

## 1. Introduction

Inet3 Ltd t/as magenta insurance needs to gather and use certain information about individuals (Data Subjects). These can include clients, customers, suppliers, employees and other individuals that magenta insurance has a relationship with or may need to contact. In doing so, magenta insurance is committed to complying with applicable Data Protection Laws and protecting the Data Protection rights of individuals.

This policy should be read in conjunction with our Data Protection Policy, Data Subject Rights Policy, Information Security policy, Personal Data Breaches Policy and Data Retention Policy

## 2. Dealing with Subject Access Requests

This document explains our internal policy for dealing with Subject Access Requests.

- Individuals have the right to request a copy of the personal data we hold on them and this is called a **Subject Access Request**
- Subject Access Requests can be received in any format (by email, over the telephone, in person or via social media) and the individual does not need to use the words 'subject access request'. If an individual requests a copy of their data, then it is a subject access request and we must deal with it appropriately.
- Our staff are trained to recognise a Subject Access Request and follow our internal procedure
- All Subject Access Requests must be referred to the Data Security Manager and will be dealt with on an individual basis as we do not envisage a high volume of requests. This policy will be revised if we begin to receive a high volume of requests.
- It is our policy to respond to a subject access request within 30 days
- It is our policy not to make a charge for Subject Access Requests, but in limited circumstances (if the request is repeated, excessive or would require a disproportionate effort), we reserve the right to make a nominal charge to cover administrative costs where appropriate.
- If we anticipate it will take longer than 30 days to respond to the request, we will write to the individual data subject to advise them of this and to let them know when we expect to be able to respond
- When responding to a Subject Access Request, we will also provide a copy of the personal data undergoing processing and where the data has been requested electronically, we will respond, where possible, by providing the information in a commonly used electronic format.
- We will provide information regarding:
  - The purpose of the processing
  - The categories of personal data concerned
  - The recipients or categories of recipients to whom the personal data have been or will be disclosed, including any recipients in third countries or international organisations and details of the appropriate safeguards in place
  - The envisaged period for which the data will be stored, or if not possible, the criteria used to determine that period
  - The existence of the right to request rectification or erasure of the personal data or to restrict or object to the processing of that data
  - The right to lodge a complaint with ICO
  - Where the personal data were not collected from the individual data subject any available information as to their source
  - The existence of automated decision-making including profiling, including information about the logic involved as well as the significance and the envisaged consequences of the processing for the individual data subject.