

Trinity Presbyterian Church Bangor

Subject Access Policy

Trinity Presbyterian Church, Bangor, is committed to complying with data protection legislation. Under the legislation, individuals can access the personal data which an organisation holds about them. An individual is entitled to be:

- told whether any personal data is being processed;
- given a description of the personal data and the reasons it is being processed;
- informed whether it will be given to any other organisations or people;
- given a copy of the information comprising the data; and
- given details of the source of the data (where this is available).

Individuals also have the following rights with which we must comply:

- to rectify personal data which is incomplete or inaccurate and, if necessary, inform third parties that this has been done;
- to be informed in a transparent manner how personal data is processed;
- to have their personal data deleted, unless there is a valid reason for not doing this;
- to restrict processing of personal data for certain purposes;
- to object to the processing of personal data in a certain way;
- to have data transferred to a third party so it can be reused (data portability); and
- to have a say in whether automated decisions are being made using the personal data and insist on an actual person intervening.

Children also have the same rights as adults. In the case of young children, these rights are usually exercised through their parents. However, if we are satisfied that the child in question is mature enough to understand their rights, then we will respond to the child directly. We will encourage the child to discuss the matter with his or her parents. When responding to a request from a child, we will take particular care to ensure that the response is given in a way that the child can understand.

There is no set manner in which the individual has to make these requests and, if such a request is made, you should always seek advice from the Data Protection Lead.

Trinity Presbyterian Church, Bangor, aims to provide the relevant data within 14 days of receipt of the request and, in any event, within one month.

If the nature of the request is particularly complex, then we may need an extension of time to comply with the request. We will inform the individual if this is the case and the reasons why this is necessary.

Also, we may need to ask for information that we reasonably need to find the personal data covered by the request.

Previously, we had the right to charge a fee for these requests. Now, this is no longer usually permitted. Individuals do not usually have to pay a fee to access their personal information (or to exercise any of the other rights).

However, we may charge a reasonable fee if the request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

We must always ensure that we know who is making the request and what they are requesting before providing any information, otherwise we may be in breach of data protection law.

A number of precedent documents have been prepared which may be of use. **Please note:** it may be advisable to seek legal advice in some situations.

- **Appendix A** contains a precedent letter which may be sent when a request for personal data is received without the necessary information.
- **Appendix B** contains a precedent Subject Access Request form. We can suggest (but not insist) that individuals complete this form so that we can process their request more easily.
- **Appendix C** contains a precedent letter acknowledging the request and informing the individual of the expected response timeframe.
- **Appendix D** contains a precedent response to a subject access request.

September 2018

Trinity Presbyterian Church

Address: Main Street, Bangor, Co Down BT20 5AF

Website: www.trinitybangor.org.uk

Telephone: (028) 9145 6619

Registered Charity in Northern Ireland (NIC: 105214)

Appendix A

Trinity Presbyterian Church

Main Street, Bangor, Co. Down BT20 5AF

Data Protection Lead: [Insert name] Email: gdprlead@trinitybangor.org.uk

Church Office Tel: (028) 9145 6619 Website: www.trinitybangor.org.uk

Minister: Rev Stephen Orr

A faith community of disciples who want to become more like Jesus and introduce others to him

To: [Insert name
and address of Data Subject]

Date: .

Dear [Insert name]

Data Subject Access Request

Reference: [insert number]

I acknowledge receipt on [date of receipt] of your request dated [insert date] for personal information

Under data protection law, you may ask for copies of paper and computer records that we hold, share or use about you.

In order to deal with your request, we may ask for proof of identity and enough information to enable us to locate the personal data that you request.

Please complete the enclosed form and return it to me with proof of your identity.

We will acknowledge safe receipt and respond within one month.

Yours sincerely

[Insert name]

Data Protection Lead

Trinity Presbyterian Church, Bangor

Appendix B **Trinity Presbyterian Church**

Main Street, Bangor, Co. Down BT20 5AF

Data Protection Lead: **[Insert name]** Email: gdprlead@trinitybangor.org.uk

Church Office Tel: (028) 9145 6619 Website: www.trinitybangor.org.uk

Minister: Rev Stephen Orr

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Data Subject Access Request Form

How to apply for personal data held about you by Trinity Presbyterian Church, Bangor:

Under data protection law you may ask for copies of paper and computer records that we hold, share or use about you. In order to deal with your request, we may ask for proof of identity and enough information to enable us to locate the personal data that you request.

Please complete this form and return it to us with proof of your identity.

We will acknowledge safe receipt and respond within one month.

Part 1: Person to whom the request relates (the Data Subject)

Title: Mr / Mrs / Miss / Ms / Other

Surname:

Forenames:

**Any other names by which you are known,
that may assist in our search:**

Address:

Telephone:

Email:

Date of birth:

**Are you are an employee or former employee
of Trinity Presbyterian Church, Bangor?**

Yes / No

Part 2: Proof of identity

To help us verify your identity, your application must be accompanied by **two** pieces of identification which, between them, clearly show your name, date of birth and current address.

Please enclose a **photocopy** of **one** of the following, as proof of your identity:

1. passport,
2. photocard driving licence, or
3. birth/adoption certificate

and a copy of a bank statement or utility bill dated **within the last three months**.

We need these documents to ensure that we are only sending information to you, the Data Subject, and not to a third party. If none of these documents is available, please contact our Data Protection Lead (see top of first page of form) for information on other acceptable forms of identification.

Part 3: Information requested

To help us to deal with your request quickly and efficiently, please provide as much detail as possible about the information that you want. Please include time frames, dates, names or types of documents, any file or incident reference and any other information that may enable us to locate your data, for example, for emails: the names of senders and recipients, and approximate dates.

Please continue on a separate sheet of paper, if necessary.

I, _____, confirm that the information provided on this form is correct and that I am the Data Subject whose name appears on this form. I understand that Trinity Presbyterian Church, Bangor, must confirm proof of identity and that it may be necessary to contact me again for further information to locate the personal data that I want. I also understand that my request will not be valid until all the requested information has been received by Trinity Presbyterian Church, Bangor.

Signature: _____

Date: _____

Appendix C **Trinity Presbyterian Church**

Main Street, Bangor, Co. Down BT20 5AF

Data Protection Lead: **[Insert name]** Email: gdprlead@trinitybangor.org.uk

Church Office Tel: (028) 9145 6619 Website: www.trinitybangor.org.uk

Minister: Rev Stephen Orr

A faith community of disciples who want to become more like Jesus and introduce others to him

To: **[Insert name
and address of Data Subject]**

Date: .

Dear **[Insert name]**

Data Subject Access Request

Reference: **[insert number]**

I acknowledge receipt of your request for personal information.

Your request was received on **[insert date]**.

Unless there are grounds for extending the statutory deadline of one month, I expect to be able to respond substantively by **[insert date]**

Yours sincerely

[Insert name]

Data Protection Lead

Trinity Presbyterian Church, Bangor

Appendix D

Trinity Presbyterian Church

Main Street, Bangor, Co. Down BT20 5AF

Data Protection Lead: [Insert name] Email: gdprlead@trinitybangor.org.uk

Church Office Tel: (028) 9145 6619 Website: www.trinitybangor.org.uk

Minister: Rev Stephen Orr

A faith community of disciples who want to become more like Jesus and introduce others to him

To: [Insert name
and address of Data Subject]

Date: .

Dear [Insert name]

Data Subject Access Request

Reference: [insert number]

We write further to your request for details of personal data which we hold about you [and our acknowledgment of [date of acknowledgement letter]].

We enclose all of the data to which you are entitled under data protection legislation, in the following format/s:

1. [details of format in which data is provided, with reasons for choosing the format, e.g.:
2. paper copies or electronic copies (on a CD or memory stick), or a new document which has been created and sets out the information that constitutes personal data]

We have contacted the following organisations and individuals in order to locate personal data held, which is within the scope of a Data Subject Access Request under the data protection legislation:

1. [list of departments and methodology for identifying personal data]

We confirm the following in relation to the areas covered under data protection legislation and data existing on the date your request was made:

1. The purposes for which the personal data is processed:
[list of purposes for which data is processed]
2. The recipients/classes of recipients of personal data to whom the data was/
may have been disclosed:
[list of recipients (by name or generic class) to whom data disclosed]

3. The information that comprises personal data:

[list information]

4. Any information available to Trinity Presbyterian Church, Bangor, as to the source of the data:

[sources of data held]. [Some names and identifying particulars have been deleted to protect the identity of third parties.]

Yours sincerely

[Insert name]

Data Protection Lead

Trinity Presbyterian Church, Bangor