1 Scope

All personal data processed by Aseptika is within the scope of this procedure.

Data Subjects are entitled to obtain:

- Confirmation as to whether Aseptika is processing any personal data about that individual.
- Allow access to their personal data by access request procedures.
- Any related information.

This procedure satisfies the requirements stipulated within the UK GDPR, Data Protection Act 2018 (UK), EU GDPR, Common Lay Duty of Confidentiality (UK only), Human Rights Article & HRA 1998.

2 Responsibilities

The Managing Director (SIRO) is accountable for responding to subject access requests in accordance with legal requirements. The Quality Regulatory & IG Director/DPO/Caldicott Guardian is responsible for responding to subject access requests.

3 Procedure

3.1 Subject Access Requests are made using the ASL IG F-005 Subject Access Request Form and must be completed and submitted in writing to Aseptika.

3.2 The Data Subject provides Aseptika with evidence of their identity, in the form of a current passport/driving license and the signature on the identity must be cross-checked to that on ASL IG F-005 Subject Access Request Form.

3.3 The Data Subject specifies to Aseptika a specific set of data held by Aseptika on their subject access request (ASL IG F-005 Subject Access Request Form). The data subject can request all data held on them.

3.4 Aseptika records the date that the identification checks were conducted and the specification of the data sought.

3.5 Aseptika provides the requested information to the Data Subject within one month (30 days or 20 working days) from the written request date.

3.6 Once received, the subject access request (SAR) application is immediately forwarded to the Quality Regulatory and IG Director/DPO/Caldicott Guardian who will ensure that the requested data is collected within the specified time frame in clause 3.5 above.

3.7 Collection entails collecting the data specified by the Data Subject or searching all databases and all relevant filing systems (manual files) in Aseptika, including all back-up and archived files (computerised or manual) and all email folders and archives.

3.8 The Quality Regulatory and IG Director/DPO/Caldicott Guardian reviews all documents that have been provided to identify whether any third-parties are present in it and either remove the identifying third-party information from the documentation or obtains written consent from the third-party for their identity to be revealed.

3.9 If any of the requested data is being held or processed under one of the following exemptions, it does not have to be provided, examples are:

- National security.
- Crime.
- Health.
- Regulatory activity.
- Research history and statistics.
- Publicly available information.
- Corporate finance.
- Domestic processing.
- Confidential references.
- Management forecasts.
- Negotiations.
- Legal advice and proceedings.
- Self-incrimination.

3.10 In the event that a Data Subject requests Aseptika to provide them with the personal data the requested information will be provided in in electronic format, unless otherwise specified.

3.11 In the event that a Data Subject requests which personal data is being processed, then Aseptika provides the Data Subject with the following information:

- Purpose of the processing.
- Categories of personal data.
- Recipient(s) of the information, including recipients in third-countries or international organisations.
- How long the personal data will be stored?
- The data subject's right to request recertification or erasure, restriction or objection, relative to their personal data being processed.
- Aseptika removes personal data from systems and processing operations as soon as a request for erasure has been submitted by the Data Subject.
- Aseptika contacts and communicates with other organisations, where the personal data of the Data Subject is being processed, to cease processing information at the request of the Data Subject.
- Aseptika takes appropriate measures, without undue delay in the event that the data subject has:
  - withdrawn consent;
  - objects to the processing of their personal data in whole or part; and
  - no longer under legal obligation and/or has been unlawfully processed.
- Inform the Data Subject of their right to lodge a complaint with the supervisory authority (ICO.org) and a method to do so.
- Information on the source of the personal data if it has not been collected from the Data Subject.

- If and where personal data has been transferred and information on any safeguards in place.

3.12 Legal advice may be sought when handling subject access requests.

3.13 Guidance on handling subject access requests is available from the Information Commissioners Office: https://ico.org.uk/for-organisations/guide-to-data-protection/principle-6-rights/subject-access-request/

4 Document History

Version	Date	Authors Initials	Reviewers Initials	Changes from Previous Version	Authorised by & date
1.1	12.02.2018	GL		First policy	
1.2	14.02.2018	KAA		Update to new format	
1.3	14.02.2018	KAA		Formatting	
1.4	16.02.2018	JMA		Updating	
1.5	02.05.2018	ETRA		Update to a new template, add reference to ASL IG F005 Subject Access Request Form	
2.0	11/12/2018	ETRA	KAA, JAA, CB	Annual review and part of CC2018-0187	
3.0	02.12.2019	JA	MP	MDR Transition update, part of CC2019-057	KAA
4.0	22.11.2021	JA	GE	Annual review CC2021-075	Kevin A Auton 23.12.2021
5.0	07.03.2022	JA	GE	Update language CC2022-018	Kevin Auton 18.03.2022
6.0	24.06.2022	JA	GE	Update policy CC2022-041	KAA 04.07.20222
7.0	27.10.2022	JA	GE	Migrate to AWS CC2022-63	KAA authorise JA 02.11.2022