

# Right for Access Policy

Pure Resourcing Solutions Limited

## Purpose

This policy outlines Pure Resourcing Solutions (Pure) response to subject access requests under the GDPR 2018.

## Definitions

Data Controller	determines the purposes and means of processing personal data (e.g. Pure)
Data Processor	responsible for processing personal data on behalf of a controller
Data Subject	any information relating to an identifiable person who can be directly or indirectly identified (e.g. candidate, client or internal employee)
Personal Data	An individual's salary, employment or financial information including contact details and CV content Comments made about them following interviews/meetings Information about an individual's family life or personal circumstances, employment or personal circumstances, any opinion about an individual
Special Categories of Data	an individual's racial or ethnic origin, political opinions, religious beliefs, physical or mental health, sexual orientation, criminal record and membership of a trade union.

## What is the GDPR?

This legislation gives individuals the right to know what information is held about them. It provides a framework to ensure that personal information is handled properly.

The GDPR works in two ways. Firstly, it states that anyone who obtains and processes personal information must comply with six principles, which make sure that personal information is:

- Processed fairly, lawfully and transparently
- Collected for a specific, explicit and legitimate purpose
- Adequate, relevant and limited to what is necessary
- Accurate and up to date
- Not kept for longer than is necessary
- Processed with appropriate security

Secondly, it provides individuals with important rights, including the right to find out what personal information is held within an organisation.

## How to make a subject access request

A subject access request is a written or verbal request for personal information (known as personal data) held about a data subject by Pure. Data Subjects have the right to see what personal information Pure holds about them, they are entitled to be given a description of the information, what it is used it for, which third-parties/Processors the personal data might be passed to and any information Pure might have about the source of the information.



However, this right is subject to certain exemptions that are set out in the GDPR.

### **Checking of identity**

Pure will first check that there is enough information to be sure of the data subject's identity. Often there will be no reason to doubt a person's identity, for example, if correspondence has been regular. If Pure has good cause to doubt the identity of a data subject, Pure will ask them to provide evidence to positively confirm their identity.

If the person requesting the information is a relative/representative of the data subject concerned, then the relative/representative is entitled to personal data about themselves but must supply the individual's consent for the release of their own personal data.

### **Collation of information**

Pure will check that enough information has been supplied to find the records requested.

If Pure feel more information is needed, then Pure will promptly ask the data subject for this. Pure will gather any manual or electronically held information and identify any information provided by a third party or which identifies a third party.

If Pure have identified that information was shared with third parties, Pure will contact any Data Processors notifying them of the Access request and requesting that they comply with the request.

Before sharing any information that relates to third parties, we will anonymise information that identifies third parties not already known to the individual (e.g. other data subjects) and edit information that might affect another party's privacy.

### **Issuing a response**

Once any queries around the information requested have been resolved, copies of the information in PDF format will be sent to you in an electronic format.

We will explain any complex terms or abbreviations contained within the information when it is shared with you. Unless specified otherwise, we will also provide a copy of any information that you have seen before.

### **Charges**

Under the GDPR Pure are unable to charge a fee.

### **Response Timeframes**

Under the GDPR the timeframe is one month starting from when Pure have received all the information necessary to identify the data subject.

Pure will identify the information or provide an explanation about why they are unable to provide the information.

In many cases, it will be possible to respond in advance of the one month target.

### **Complying with a subject access request**

If a data subject has made a previous subject access request Pure must respond if a reasonable interval has elapsed since the previous request.

A reasonable interval will be determined upon the nature of the information, the time that has elapsed, and the number of changes that have occurred to the information since the last request.



Where requests are manifestly unfounded or excessive, in particular because they are repetitive, Pure can:

- charge a reasonable fee taking into account the administrative costs of providing the information;
- Refuse the request

Pure may refuse to respond to a subject access request. If Pure refuse a request they will explain why to the individual, informing them of their right to complain to the supervisory authority and to a judicial remedy without undue delay and at the latest within one month.

#### Authority

If Pure agrees that the information is inaccurate, Pure will correct it and where practicable, destroy the inaccurate information. Pure will consider informing any relevant third party of the correction. If Pure do not agree or feel unable to decide whether the information is inaccurate, Pure will make a note of the alleged error and keep this on file.

#### Processing Data

A data subject can object to Pure processing their personal data altogether, in relation to a particular purpose or in a particular way through a right for erasure request.

This is only possible when conducting some processing activities and there is a process that the individual must follow when making this request.

Pure must give the data subject written notice that either Pure have complied with your request, intend to comply with it or state the extent to which Pure will comply with it and why.

#### Complaints Procedure

If an individual is not satisfied by Pure's actions, they can seek recourse through our internal complaints procedure, the Information Commissioner or the courts.

Ben Farrow, Operations Director will deal with any written or verbal complaint about the way a request has been handled and about what information has been disclosed. The Operations Director can be contacted at:

The Workspace  
Pioneer Court  
Vision Park  
Histon  
Cambridge, CB24 9PT  
Telephone: 01223 209888 / Email: [ben.farrow@prs.uk.com](mailto:ben.farrow@prs.uk.com)

If an individual remains dissatisfied, they have the right to refer the matter to the Information Commissioner.

The Information Commissioner can be contacted on 0303 123 1113 or at <https://ico.org.uk/concerns/>, or any other relevant supervisory authority should your personal data be processed outside of the UK, if you believe that your data protection rights have not been adhered to.

<b>Responsible</b>	Tia Bruzos, Quality, Compliance & Systems Team Leader
<b>Accountable</b>	Ben Farrow, Operations Director
<b>Consulted</b>	Management Team
<b>Informed</b>	All employees, candidates and contacts

