



Irish Countrywomen's Association
Bantracht na Tuaithe

Data Subject Access Request Policy

The Irish Countrywomen's Association ("ICA") depends on its ability to process Personal Data and it is therefore vitally important that we get it right and act in compliance with General Data Protection Regulations ("GDPR").

Identifiable natural persons (known as "Data Subjects" or "DS") with whom the ICA has any form of working relationship have a right to request a copy of the information that ICA hold about them which could or might identify them personally; this request is known as a Data Subject Access Request ("DSAR") see: *Article 15 – Right of Access by the Data Subject*.

Data Subjects are entitled to request access to any information held about them, which includes Personal Data.

Please note: DSARs will be logged, managed, actioned and processed by the ICA Administrator in consultation with the ICA CEO. The ICA support email address for DSAR's is: admin@ica.ie. If the DSAR request involves deletion (as opposed to amendments) of records, a **Log** will be kept by the ICA.

Identifying a DSAR

Formal requests in writing from a Data Subject will almost always be treated as a DSAR and therefore the ICA should ensure that any such requests are handled immediately upon receipt.

Common example of a DSAR would be a request for access to membership information that the ICA hold about them or deletion of their data or duplications. An informal request for data or information may or may not constitute a DSAR.

If the nature of a request is unclear or the ICA are not sure whether it would be considered a formal DSAR, the request should be referred to the ICA CEO without any delay.

Processing a DSAR

In order to process a DSAR, the ICA must first establish the identity of the Data Subject making the request. This should be done by asking the individual to confirm one of either their address, payroll number, membership number, date of birth or other identifiable data, which should then be validated in the relevant ICA database. If there is any reason to doubt the identity of the individual making the request, further evidence should be sought.

In the event that a solicitor or other authorised representative is making a request on behalf of a Data Subject, the ICA must ensure that relevant consent is obtained and evidenced from the data subject before processing a DSAR.

Response Time

Under the GDPR, the ICA have up to a maximum of **one month from date of receipt** of a DSAR to process the request and supply the information to the Data Subject.

It is therefore vitally important that all DSARs are referred to the CEO **immediately upon receipt**. There should not be a delay in referring such requests to the CEO, especially if unsure as to whether it constitutes a formal DSAR or not.

Providing Information

The ICA *Administrator* is responsible for processing and compiling information for release when a DSAR is received.

Information relating to a Data Subject will be compiled, often in various formats and reviewed in order to redact any information which identifies another living individual other than the Data Subject to which the DSAR relates. It is vitally important that the data privacy of other individuals is not compromised when responding to a DSAR. Redacted DSAR files can only be released (in a secure, electronic format e.g. a **FULLY secured** PDF file) following approval from the CEO.

Charging a Fee

Please note that the ICA cannot charge a fee to process or provide information to Data Subjects. A copy of the information must be provided free of charge.

Exemptions

There are certain, limited circumstances, where the ICA may not be obliged to supply certain information as part of a DSAR. Such exemptions include but are not limited to:

- Publicly available information.
- Data processed for certain purposes related to crime and taxation.
- Confidential References received or created by the ICA.
- Management information (mainly of a planning / forecasting nature).
- Legal advice and proceedings (including information for which legal privilege is claimed).

It is unlikely that an exemption would be relied upon to refuse a DSAR, and in any event where an exemption is identified it may only apply to certain information within a DSAR (response) file and therefore not prevent the release of the remaining information on the DSAR response file. Exemptions can only be considered and approved by the CEO, following appropriate checks.

Further Information

All DSARs will be handled by the ICA *Administrator* who has the responsibility to control, manage and log the DSAR. If there are any complications or delays in processing the request, the DS shall be notified in a timely manner. Prior to issuing the completed response file to the DS it will be referred to the CEO.

If the DS feels request has not been satisfactorily dealt with, DS has the option to put concerns directly, in writing, to the CEO.

The CEO will reply within two to five working days of receipt of the letter and will ensure that appeal is considered at Board level and will respond within two weeks of the referral to the Board. DS will be notified of the next Board meeting and a subsequent reply.

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Finally, if data subject is still not satisfied with response, the ICA can redirect the data subject request to an independent group who will assess complaint/request in an objective manner.