

PNA – DATA SUBJECT ACCESS REQUEST PROCEDURE

1. Scope

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

Data subjects are entitled to obtain:

- Confirmation as to whether PNA is processing any personal data about that individual;
- Access to their personal data;
- Any related information; where the information is processed to and why.

2. Responsibilities

2.1 The Data Protection Officer is responsible for the application and effective working of this procedure, and for reporting to the General Secretary on Subject Access Requests (SARs).

2.2 The Data Protection Officer is responsible for handling all SARs.

3. Procedure

3.1 Subject Access Requests are made using the Subject Access Request Record (available on www.pna.ie)

3.2 The data subject provides PNA with evidence of their identity, in the form of a current passport/drivers license and the signature on the identity must be cross-checked to that on the application form.

3.3 The data subject specifies to PNA specific set of data held by PNA on their subject access request (SAR). The data subject can request all data held on them.

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

3.5 PNA provides the requested information to the data subject within one month from this recorded date. There are no circumstances in which an extension to that one month will be provided, and failure to provide the requested information within that one month is a breach of the GDPR.

3.6 Once received, the subject access request (SAR) application is immediately forwarded to the Data Protection Officer who will ensure that the requested data is collected within the specified time frame in clause 3.5 above.

Collection entails:

3.6.1 Collecting the data specified by the data subject, or

3.6.2 Searching all databases and all relevant filing systems (manual files) in PNA including all back up and archived files (computerised or manual) and all email folders and archives. The Data Protection Officer maintains a data map that identifies where all data in PNA is stored

3.7 The Data Protection Officer maintains a record of requests for data and of its receipt, including dates. This record will be kept on the PNA main file server.

3.8 The Data Protection Officer reviews all documents that have been provided to identify whether any third parties are present in it, and either removes 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:

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- National security
- Crime and taxation
- Health
- Education
- Social Work
- Regulatory activity
- Journalism, literature and art
- Research history, and statistics
- Publicly available information
- Corporate finance
- Examination marks
- Examinations scripts
- Domestic processing
- Confidential references
- Judicial appointments, honours and dignities
- Crown of ministerial appointments
- Management forecasts
- Negotiations – if process has gone to legal proceedings/Gaurds
- Legal advice and proceedings
- Self-incrimination
- Human fertilization and embryology
- Adoption records
- Special educational needs
- Parental Records & Reports

3.10 In the event that a data subject requests PNA to provide them with the personal data stored by the controller/processor, then PNA will provide the data subject with the requested information in electronic format, unless otherwise specified.

3.11 In the event that a data subject requests what personal data is being processed then PNA provides the data subject with the following information:

3.11.1 Purpose of the processing

3.11.2 Categories of personal data

3.11.3 Recipient(s) of the information, including recipients in third countries or international organisations

3.11.4 How long the personal data will be stored

3.11.5 The data subject's right to request rectification or erasure, restriction or objection, relative to their personal data being processed.

3.11.5.1 PNA removes personal data from systems and processing operations as soon as a request for erasure has been submitted by the data subject.

3.11.5.2 PNA contacts and communicates electronically 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.

3.11.6 Inform the data subject of their right to lodge a complaint with the supervisory authority and a method to do so (Complaints Procedure GDPR DOC 2.9).

3.11.7 Inform the data subject of any automated decision-making.

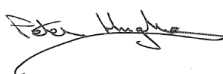
3.11.8 If and where personal data has been transferred and information on any safeguards in place.

3.12 PNA uses email file sharing, to respond to SARs:

Document Approval

The Data Protection Officer /General Secretary is responsible for ensuring that this procedure is reviewed in line with the review requirements of the GDPR. A current version of this document is available to all members of staff and all members and is available on www.pna.ie

This procedure was approved by the General Secretary and is issued on a version controlled basis under his signature.

Issue	Description of Change	Approval – General Secretary	Date of Issue
1	Initial issue		24/05/18