



**DATA REQUEST**

# Subject Access Request

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## **1. Introduction**

Albatross Bus & Coaches Ltd recognises the rights of individuals under the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 to access their personal data. A Subject Access Request (SAR) enables individuals to obtain confirmation as to whether their personal data is being processed and to receive a copy of that data.

Requests may relate to any personal data held by the organisation, including information stored within operational systems, emails, databases and manual records. While a standard Subject Access Request Form is available, individuals are not required to use it, and requests can be made in any written or verbal format.

## **2. Purpose**

The purpose of this policy is to establish a clear and consistent process for handling Subject Access Requests in a timely and compliant manner. It ensures that Albatross Cars responds to requests efficiently, protects the rights of individuals and maintains compliance with legal and regulatory obligations.

## **3. Key Considerations**

Albatross Bus & Coaches Ltd, ensures that appropriate measures are in place to effectively manage Subject Access Requests. Staff are trained to recognise when a request is being made and understand the importance of handling such requests promptly and appropriately. Personal data is maintained in an organised manner across systems to enable efficient retrieval.

The organisation also ensures that contracts with third-party processors include provisions requiring their cooperation in responding to Subject Access Requests. Where Albatross Bus & Coaches Ltd acts as a data processor, it will support the data controller in fulfilling requests within agreed timeframes, or within four working days where applicable.

Key considerations include:

- Staff awareness and training

- Efficient data storage and retrieval
- Third-party processor cooperation
- Clear internal responsibilities

## **4. Roles and Responsibilities**

The designated Data Protection Lead is responsible for overseeing all Subject Access Requests and ensuring compliance with legal requirements. This includes providing guidance, reviewing responses and maintaining appropriate records of requests and outcomes.

The Data Protection Lead will be supported by relevant staff members who will assist in gathering the required information from various sources, including electronic systems, email records and physical files.

### **Sources of data may include:**

- Customer and booking records
- Email correspondence
- Internal files and documents

## **5. Rights of the Individual**

Individuals have the right to obtain confirmation that their personal data is being processed and to access that data. In addition to receiving a copy of their personal data, individuals are entitled to supplementary information that explains how their data is used.

Where applicable, individuals will also be informed about any automated decision-making processes and whether their data is transferred outside the UK.

### **Individuals are entitled to:**

- Told whether any personal data is being processed
- Given a description of the personal data, the reason it is being processed and whether it will be given to other organisations or people.
- How long their personal data shall be retained for or the criteria for its retention.
- The source of the data
- Confirmation of the right to rectification or erasure or restriction of processing
- The right to lodge a complaint with the supervisory authority
- If there is any automated decisions
- Cross boarder transfers
- Given a copy of their personal data
- Given the source of the data (where possible)

Subject access provides the right for individuals to request to see their own personal data rather

than see copies of the documents.

## **6. Procedure**

### **Stage 1 - Considering the Request**

Whilst there is a standard Subject Access Request form there may also be requests that are received in a different form. For example:

Please send me a copy of my employment records

I'd like to see all the records pertaining to me over the last 12 months.

If it is likely that the request should be dealt with under this process or if you are unsure of the nature of the request, please seek advice from Data Protection lead.

### **Can you be sure of the requesters identify?**

Unless the request is being made in person by an employee or someone known to the business, proof of ID is required (driving license or passport, utility bill (No more than 3 months old)). This should be attached to the Subject Access Request form along.

### **Is there any other information needed to find the information requested?**

If the customer or employee asks for all the information in their file we can reasonably ask for the requestor to provide some additional information to narrow down the search, for example dates or something in-particular they are looking for.

However, the individual does have the right to see all the information available pertaining to them and can simply restate this request.

### **Is there a fee involved?**

There is no fee chargeable unless the requests are manifestly unfounded (continuous, repetitive, ongoing).

Once the Subject Access Form has been received a letter of confirmation should be sent without delay.

### **Stage 2 - Processing and Responding to the Request**

Once the request has been validated, relevant data must be collected from all applicable sources. Care must be taken to ensure that the response does not infringe on the rights of third parties. Where documents contain information about other individuals, appropriate steps must be taken to redact or remove identifying details unless consent has been obtained or disclosure is otherwise justified.

It is important that the person handling the requests consider the following when reviewing the

documents:

Does the file contain information about other people?

In fulfilling the request, the privacy and rights of third parties must be considered before disclosing the requested information to the requestor. The following questions should be answered:

- Does the request require the disclosure of information which identifies a third-party individual?
- Has the third-party individual consented to the disclosure?
- Would it be reasonable to disclose third party information without consent?

If you believe a third party's information should not be disclosed. You may choose to delete their name, titles or any other information that reveals their identity, even if this means withdrawing the entire document. Any such reason will need to be documented in the response.

## **7. Exemptions and Limitations**

In certain circumstances, Albatross Bus & Coaches Ltd may be permitted to withhold some or all of the requested information. These exemptions are applied carefully and in accordance with legal requirements.

Exemptions may apply where disclosure would prejudice crime prevention or detection, involve confidential references, affect ongoing negotiations, or where the data is used solely for research or statistical purposes. Any decision to withhold information must be documented and justified.

## **8. Response Time and Format**

Albatross Bus & Coaches Ltd will respond to all valid Subject Access Requests within one calendar month of receipt, in accordance with UK GDPR requirements. This period may be extended by up to two additional months for complex or multiple requests, in which case the individual will be informed of the delay and the reasons for it.

Responses will be provided in a secure and commonly used format, ensuring that the information is clear, legible, and easy to understand.

## **9. Documentation and Record Keeping**

All Subject Access Requests must be recorded and maintained for audit and compliance purposes. This includes details of the request, actions taken, timelines, and the final outcome. Maintaining accurate records supports accountability and demonstrates compliance with UK GDPR requirements.

## 10. Document Ownership and Approval

This policy will be reviewed annually or in response to significant changes in legal, regulatory, or operational requirements. The Data Protection lead is responsible for maintaining and updating the document.

### Approved by

Managing Director: \_\_\_\_\_

Signature: \_\_\_\_\_

Approval Date: 15 April 2026

