Data Protection – Right of Access (subject access request)

City, University of London (hereafter "City") is committed to a policy of compliance with Data Protection laws and the rights of data subjects. This guidance describes how data subjects can access the personal data City holds and the reasons for doing so. This policy is to be read in addition to The Conditions of use, Acceptable Use Policy, Information Security Policy and the Data Protection Policy.

Subject access request procedure

Individuals wishing to have access to personal data held by the University under the Data Protection Act can send a completed form to:

Information Compliance Officer
Information Services
Northampton Square
London
EC1V 0HB
or by email to: dataprotection@city.ac.uk

Information required and procedure for responding to subject access requests

The personal data requested should be clearly identified. The University may require conformation of the identity of the data subject and/or the person making the request. The University will respond to requests within one month of receipt of the submitted request (provided sufficient information has been given to City to enable City to process the request). If your request is complex City may require up to an additional two months to complete the request. If this is the case City will inform you how much additional time is needed and the reasons why within the first month.

General guidance when requesting subject access to emails

Data subjects are entitled to have access to their personal data held in the form of emails under the Act. However, data subjects must supply enough information to enable the University to locate the relevant emails. As a minimum, the following information must be provided to the Information Compliance Officer when completing the form:

- The fact that the data may be held in the form of emails;
- The names of the authors or recipients of the messages;
• The dates or ranges of dates upon which the messages have been sent;
• Any other information that might assist the University in locating the data.

Please note that failure to provide information reasonably required to narrow down the search could result in the University being unable to comply with a subject access request.

**Information containing personal data about other people (third parties)**

Some information may contain personal data relating to third parties. The request may therefore lead to a conflict between the data subject’s rights of access and the third party’s rights over their own personal information. In responding to subject access requests City will need to ensure that the rights of those third parties are not compromised by releasing the information. As the obligation on City is to provide information rather than documents, redaction or editing may be used so that the third party information does not form part of the requested information.

City may also ask for consent from the third party. Where consent is not given, in line with the Information Commissioner’s Subject Access Code of Practice, City will consider whether it is reasonable in all the circumstances to disclose the email without the third party’s consent.

**Right of Appeal**

If you are dissatisfied with the outcome of the request, you have a right of appeal to the Information Commissioner’s Office. Details follow for ease of reference.

By Post: Information Commissioner’s Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

By Telephone: 01625 545 700
Via the Website: www.ico.org.uk