

# Phone Credit for Refugees Subject Access Request Procedure

#### Introduction

Phone Credit for Refugees (PC4R) is committed to upholding the rights of the public in line with the General Data Protection Regulation 2018 (GDPR). This includes the right of our volunteers, service users, and donors to access the personal information we hold about them.

This document outlines how you can make a request to PC4R under GDPR and what our policy is for responding to them.

## What is a Subject Access Request?

A Subject Access Request (SAR) is a written request for the personal information held about you by PC4R.

### How do you make a subject access request?

Please send your request to us at info@pc4r.org with the following information:

- Your full name
- Your email address
- Your address
- Proof of identify (e.g. Photocopy of passport, identity documents, driving license)

Please also describe in as much detail as possible what information you are looking for, including any relevant details you think will help us identify the information you require.

#### What can I ask for?

You can ask us to give you the following information:

- The personal information we hold about you
- A description of the information
- · What we use it for

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- Who we might pass it on to
- Where we got the information

We aim to respond to these requests efficiently and transparently; however we might not be able to provide everything you've asked for. This is usually because of confidentiality - for instance, if the information you request reveals details that may directly or indirectly identify another person, then we'll have to seek consent from that person before we can give it to you. If they don't give consent, then we'll send you what we can and explain the reasons for it.

A SAR can be made free of charge and PC4R will have 30 days to respond upon receipt of the written request.

We can accept SARs made for you by another person, such as a lawyer or a family member, as long as they can prove that you've asked them to act on your behalf.

## How do we process a Subject Access Request?

- 1 First, we check your identity to make sure that you're asking for your own information
- 2 Then we gather the information you've asked for
- 3 Finally, we provide you with the requested information, redacted where appropriate

#### What would we consider to be an unreasonable request?

There are two main reasons why we wouldn't process a SAR; these are if a previous request has been made and if the request or if the information is also about other people.

If a previous request for a SAR has been made, we will look at the request to see how much time has passed since the first request. We'll consider:

- The nature of the information you're asking for
- The time that has passed since your first request
- The number of changes that have occurred since the last request
- Whether the request is vexatious

If we find that no changes to the information have been made then we may decline your request. If any of the information you request falls under the definition of exempt information then we will be unable to provide you with this information.

## What can you do if you spot an error in the information we provide?

If, when you receive your information bundle, you notice there is an error, please contact us straight away. We will rectify the information to ensure our records are up to date and also destroy (when possible) the incorrect data.

If we do not agree or feel unable to decide whether the information is inaccurate, we will make a note of the alleged error and keep this on file for our records.