

Subject Access Request (SAR) Process

ProvisionIQ Ltd — Handling Requests to Access Personal Data

Document	Subject Access Request (SAR) Process
Version	1.0
Date	22 May 2026
Owner	CTO
Legal basis	UK GDPR Art. 15 · Data Protection Act 2018 s.45
Response deadline	One calendar month from receipt (extendable by 2 months for complex requests)
Contact	dpo@provisioniq.co.uk

Controller vs Processor

Where ProvisionIQ holds personal data on behalf of a school or LA (as Data Processor), the school/LA is the Data Controller and is responsible for responding to SARs from pupils, parents, and staff about that data.

ProvisionIQ will provide technical assistance to the Data Controller to fulfil SARs (data export, record identification) within 5 business days of the Controller's written instruction.

Where ProvisionIQ is the Data Controller (account data, marketing data, website data), ProvisionIQ responds to SARs directly within one calendar month.

1. Right of Access — What Data Subjects Are Entitled To

Under UK GDPR Article 15, a data subject has the right to obtain from the controller: confirmation of whether personal data is being processed; a copy of that personal data; and the following supplementary information:

- The purposes of processing
- The categories of personal data concerned
- Recipients or categories of recipient
- The envisaged retention period
- The right to rectification, erasure, restriction, or objection
- The right to lodge a complaint with the ICO
- Information about the source of the data (if not collected from the data subject)

- The existence of automated decision-making (including profiling) and meaningful information about the logic involved

Children and SARs

Children can make SARs themselves if they have sufficient understanding to do so (typically from around age 12, but this is assessed on the circumstances). Parents/guardians can make SARs on behalf of children.

ProvisionIQ processes SEND data about children under 18. Special care is required: the DPO assesses each SAR involving child data individually to ensure disclosure serves the child's best interests.

Where a parent's SAR conflicts with the child's interests or confidentiality (e.g. in safeguarding situations), the DPO takes advice from Legal Counsel before responding.

2. SAR Process — Step by Step

Step	Action	Owner / Deadline
1. Receive	SAR received via dpo@provisioniq.co.uk, written letter, or via the platform support channel. Log in SAR Register: date received, requester name, data subject(s), request scope.	DPO / Admin Day 0
2. Verify identity	Verify the requester's identity before disclosing any data. For staff: email from verified work address is sufficient. For members of public: request two forms of ID. For parents: confirm relationship to the child. Do NOT release data before identity is verified.	DPO Within 5 business days
3. Clarify scope	If the request is unclear or very broad, contact the requester to clarify scope (optional; does not pause the clock). Document any clarification.	DPO Within 5 business days
4. Search and compile	Identify all personal data held for the data subject across: platform records; email; support tickets; billing records; audit logs (note: audit logs may be redacted to protect third parties). If Controller data: instruct relevant team. If Processor data: notify the Data Controller and request data extraction.	DPO + relevant teams By Day 20
5. Review for exemptions	Apply exemptions where relevant: third-party data (redact other individuals' data); confidential references; legally privileged information; safeguarding data that could put the child at risk; crime prevention/detection (DPA 2018 s.45). Document each exemption applied.	DPO + Legal Counsel By Day 25
6. Prepare response	Compile the SAR response pack: cover letter explaining what is included/excluded and why; copy of personal data in intelligible format; supplementary information (Art. 15(1)(a)-(g)). Format: PDF or secure email. Never send unencrypted via standard email.	DPO By Day 28

7. Respond	Send SAR response. Obtain delivery confirmation. Log response date in SAR Register.	DPO By Day 30 (calendar month from receipt)
8. Extension (if needed)	If complex: notify requester within one month that extension of up to 2 additional months is required, explaining the reason. Clock restarts on notification date.	DPO By Day 28 (if extending)

3. SAR Response Timeframes

Scenario	Response Deadline
Standard SAR	One calendar month from date of receipt
Complex SAR (high volume of data, multiple systems, legal exemptions)	Up to three calendar months; requester notified of extension within one month
SAR from Data Controller about Processor data (school/LA instructing ProvisionIQ)	ProvisionIQ provides data extract within 5 business days of instruction; Controller responds to data subject within their own deadline
SAR refused (in whole or part)	Written refusal with reason within one month; inform of right to complain to ICO

4. Fees

SARs are free of charge. ProvisionIQ may charge a reasonable fee or refuse to respond to requests that are manifestly unfounded or excessive, particularly if repetitive. The DPO makes this assessment and documents the rationale. The requester is informed of any fee before data is provided.

5. SAR Register

Every SAR (including withdrawn and refused requests) is logged in the SAR Register maintained by the DPO. The register records: date received, requester, data subject, scope, identity verification method, response date, response summary, any extensions or refusals, and outcome. Retained for 3 years from response date.

6. Right to Complain

If a data subject is unhappy with ProvisionIQ's SAR response, they have the right to: contact the DPO at dpo@provisioniq.co.uk to request a review; or lodge a complaint with the ICO at ico.org.uk or 0303 123 1113.

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