

# Subject Access Request Policy



Atlas Language School is committed to protecting personal data and upholding the rights of individuals under the General Data Protection Regulation (GDPR) and the Data Protection Act 2018.

This policy sets out how Atlas Language School handles Subject Access Requests (SARs) in a lawful, transparent, and consistent manner, in line with the Atlas Data Protection Policy, Rights in Relation to Data Policy,, Staff Handbook, and related GDPR policies.

## 1) Scope

This policy applies to all Subject Access Requests made by:

- Prospective, current, and former students
- Employees, contractors, and job applicants
- Host families and host family applicants
- Any other individual whose personal data is processed by Atlas Language School

## 2) What is a Subject Access Request?

A Subject Access Request is a request by an individual to obtain confirmation as to whether their personal data is being processed and, if so, to access that personal data and related information.

A SAR may be made verbally or in writing and does not need to reference GDPR explicitly to be valid.

## 3) Personal Data

Personal data means any information relating to an identified or identifiable living individual. This includes, but is not limited to:

- Identification and contact details
- Academic, attendance, or assessment records
- HR, payroll, and recruitment records
- Accommodation and welfare records
- CCTV images
- Correspondence where the individual is identifiable

Special category data (e.g. health data) and criminal conviction data are subject to additional protections under GDPR.

# Subject Access Request Policy



## 4) Making a Subject Access Request

Requests should be directed to the Directors, Operations Manager, or senior management.

To enable efficient processing, individuals may be asked to:

- Confirm their identity
- Clarify the scope of the request (e.g. time period, data categories)

A request will not be delayed unnecessarily where sufficient information has already been provided.

## 5) Verification of Identity and Authority

Atlas Language School will take reasonable steps to verify the identity of the requester before releasing personal data.

Where a request is made by:

- A representative, written authorisation will be required
- A parent or guardian, the child's capacity to consent will be assessed in line with Irish DPC guidance
- A person acting under legal authority, appropriate documentation must be provided

## 6) Timeframes

Atlas Language School will respond to SARs without undue delay and in any event within one month of receipt.

Where a request is complex or involves a large volume of data, the response period may be extended by up to two further months. The requester will be informed of any extension and the reasons for it within one month of receipt.

## 7) Information Provided

In response to a SAR, Atlas Language School will provide:

- Confirmation as to whether personal data is being processed
- A copy of the personal data requested
- Information on the purposes of processing
- Categories of personal data concerned

# Subject Access Request Policy

- Recipients or categories of recipients
- Retention periods or criteria
- Information on data subject rights
- Information on the right to lodge a complaint with the Data Protection Commission

Information will be provided in a commonly used electronic format unless otherwise requested.

## 8) Third-Party Data

Where personal data includes information relating to third parties, Atlas Language School will:

- Assess whether disclosure would adversely affect the rights and freedoms of others
- Redact or anonymise third-party data where appropriate
- Disclose information where it is reasonable and lawful to do so

Third-party consent is not required where disclosure is otherwise lawful under GDPR.

## 9) Exemptions and Restrictions

Certain data may be withheld or restricted where permitted by GDPR and Irish law, including:

- Legal professional privilege
- Confidential references
- Management forecasting or negotiations
- Research or statistical purposes

Any refusal or restriction will be explained to the requester.

## 10) Rectification and Erasure

If personal data is found to be inaccurate, Atlas Language School will rectify it without undue delay.

Requests for erasure or restriction will be handled in accordance with GDPR and relevant Atlas policies.

## 11) Data Security

# Subject Access Request Policy



All SARs are handled securely. Information is disclosed only to verified individuals and via secure methods.

## 12) Complaints

Individuals have the right to lodge a complaint with the Data Protection Commission if they are dissatisfied with how their request has been handled.

## 13) Responsibilities

The Directors retain overall responsibility for compliance.

Day-to-day handling of SARs may be delegated to senior staff or the Operations Manager / GDPR Lead.

All staff must promptly forward any SARs received to the appropriate person.

This policy will be reviewed periodically to ensure continued compliance with data protection law and Atlas policies.