



Subject Access Request – Pivotal

1.0 The right of access or Subject Access Request (SAR)

- 1.1 You have the right to ask Pivotal if we are using or storing your personal information. You can also ask us for copies of your personal information, verbally or in writing.
- 1.2 You can make a SAR verbally, but we recommend that you put your request in writing as this gives you a written record. This is called the right of access and is commonly known as making a **Subject Access Request** or SAR.

2.0 Why make a Subject Access Request?

- 2.1 You can make a Subject Access Request to find out:
 - what personal information we hold about you;
 - how we are using it;
 - who we are sharing it with;
 - where we got your data from.
- 2.2 This information can also help you exercise your other information rights effectively:
 - your right to be informed if your personal data is being used; Pivotal must inform you if we are using your personal data;
 - your right to get copies of your data; you have the right to find out if we are using or storing your personal data;
 - your right to correct your data; you can challenge the accuracy of the data held by Pivotal;
 - your right to have data deleted; you can ask Pivotal to delete your personal data;
 - your right to limit how Pivotal uses your personal data;

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Policy owner	Director of People
Agreed by	Senior Leadership Team
Version	6.0
Issue date	June 2026
Review date	June 2028

- your right to data ‘portability’. You have the right to get your personal data from us in a way that is accessible to you;
- your right to object to the use of your data. You have the right to object to how we process or use your personal data in some circumstances;
- your rights relating to decisions being made about you without human involvement, this means decisions made about you when your data is processed automatically, for example applying for a bank loan;
- your right to access information from a public body;
- your right to raise a concern; tell us if you are concerned about how we are using your personal data.

2.3 Full details on your rights can be found at www.ico.org.uk/your-data-matters

3.0 How do I make a Subject Access Request?

3.1 You can make a SAR either verbally or in writing to any Pivotal colleague. You do not need a special form to do this.

4.0 What should my Subject Access Request say?

Regardless of how you make your SAR, you will need to provide the following information:

- a clear label for your request (for example, use ‘Subject Access Request’ as your email subject line or a heading for your letter);
- the date of your request;
- your name (including any aliases, if relevant);
- any other information used by the organisation to identify or distinguish you from other individuals (for example, a customer account number or employee number);
- your up-to-date contact details;
- a comprehensive list of what personal data you want to access, based on what you need;
- any details, relevant dates, or search criteria that will help the organisation identify what you want;
- how you would like to receive the information (e.g. by email or in print).

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Do not Include:

- other information with your request, such as details about a wider complaint;
- a request for all the information we hold on you, unless that is what you want (if we hold a lot of information about you, it could take us longer to respond, or make it more difficult for you to locate the specific information you need);
- threatening or offensive language.

5.0 What should my SAR look like?

5.1 To help you make your Subject Access Request you can use the letter template contained in Appendix 1 as a guide. You will need to add exactly what information you are asking for.

5.2 You are not required to use a standard form or the letter template below. This is only offered to help you if you so choose, to:

- structure your request;
- make sure you include all the necessary details and any supporting documents;
- help you find the best person in Pivotal to help you with your request.

5.3 You might want to ask someone to help you make your request. Before you do this make sure you are comfortable with that person having access to your personal information. We will need your express written consent to share your personal data with them and we will need to be satisfied that they are acting on your behalf.

Examples of people who might make a request on your behalf include:

- someone with parental responsibility;
- a person appointed by the court;
- a solicitor acting on your behalf;
- a friend or relative who you are comfortable with knowing about your personal data.

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Pivotal will need to be satisfied that the person asking on your behalf is allowed to represent you. We will ask for formal supporting evidence for example:

- written authorisation from you;
- a power of attorney from the courts.

6.0 Actions Pivotal will take in the event of receiving a SAR

Within one calendar month of receiving a SAR we will:

- Respond without undue delay, including all relevant information in respect of the request;
- Redact some information if we have legal grounds to do so e.g. to protect the personal information of others.

In complex cases, where it is not practical for us to supply the information within one calendar month, we may extend the response period by up to a further two months. We will inform you within the original one-month period of the reasons for the delay and when you can expect to receive the information.

Where necessary, Pivotal may request proof of identity before processing a Subject Access Request. The statutory response period will begin once sufficient identification information has been received.

Pivotal’s data protection lead will keep a record of all subject access requests and should be notified immediately when any colleague receives a subject access request.

Information released under a Subject Access Request must be reviewed and authorised by the data protection lead or an appropriately authorised senior manager.

If you feel you have not received all the information you requested you should send us a formal complaint, in writing, listing the information you believe is missing.

Subsequent to sending us a formal written complaint, if you still feel you do not have all the information you requested from us you should make a complaint to the ICO <https://ico.org.uk/> who will contact us.

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Pivotal reserves the right to refuse or charge a reasonable administrative fee for requests that are manifestly unfounded, excessive, or repetitive in accordance with UK GDPR.

Pivotal will conduct reasonable and proportionate searches for personal data across systems where information is likely to be held, and:

- searches will be proportionate and reasonable ;
- deleted data may not be retrievable;
- some archived systems may not be searchable.

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Appendix 1

Written Authorisation Template

Your name

Your full postal address

Your contact details

The date

Dear

Subject Access Request

[Include your full name and other relevant details to help us identify you].

Please supply the personal data you hold about me, which I am entitled to receive under data protection law, held in:

**Give specific details of where to search for the personal data you want, for example:*

- *my personnel file.*
- *emails between named people.*
- *my medical records.*
- *the CCTV camera footage taken at (place) on (date)*
(please be aware that CCTV footage is only stored for a maximum of 28 days)
- *financial statements held in account number xxxxx.]*

If you need any more information from me to help you provide this information to me, please let me know as soon as possible.

**If relevant, state whether you would prefer to receive the data in a particular electronic format, or printed form.*

It may be helpful for you to know that data protection law requires you to respond to a request for personal data within one calendar month.

If you do not normally deal with these requests, please pass this letter to a colleague who deals with data protection or a relevant staff member.

If you need advice on dealing with this request, the Information Commissioner's Office can assist you. Its website is ico.org.uk/ or it can be contacted on 0303 123 1113.

Yours faithfully.

[Signature]

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