



# Subject Data Access Request Policy

## Introduction

We are committed to being transparent about how we collect and use an individual's personal data, and to meeting our data protection obligations as a data processor under the General Data Protection Regulation (GDPR). Further information in relation to the Company's full responsibilities can be found in our **Data Protection** policy.

The GDPR allows individuals to access information from organisations that process their personal data. The process for obtaining this information is known as a subject data access request or SDAR. This policy sets out our obligations and how you can make a request, and applies to the personal data of:

- job applicants
- employees
- workers
- contractors
- work experience
- work placements
- apprentices; and
- former employees

This policy does not apply to the personal data of clients or other personal data processed for business purposes for example, our customers.

## Our Obligations

In response to a SDAR, we will provide you with the relevant privacy notice setting out your rights as a data subject and our obligations as a data controller. We are also required to provide a copy of the personal data undergoing processing. The information provided will be in a commonly used electronic format, unless you agree to receive it in some other way.

## How to Make a Request

If you would like to request access to your personal data, please email us at:

[MyEmployeeData@TheEntertainer.com](mailto:MyEmployeeData@TheEntertainer.com).

In response to your request, we will send you a 'Subject Data Access Request Form', which you are required to complete describing the information you want to access, and sign the declaration to confirm you are the individual making the request. You will also need to provide proof of identification and this can be a passport, driving licence or birth certificate.

We will respond within one month of receiving your form and identification. In most cases the response is to provide the data requested but sometimes, such as where the request is complex, we may need longer to complete the request and may extend the period by a further two months allowing for up to three months. If this is the case, we will let you know the reason for the extension period within one month of receiving your request.

## Exemptions



There are some exemptions to the information that can be disclosed in response to a request. These include where data:

- is subject to legal professional privilege
- is processed for the purpose of management planning
- relates to intentions in negotiations with an individual; or
- consists of a confidential reference that the employer has given

We may also redact or restrict disclosure where, for example, the information contains third-party personal data.

### **Unfounded or Excessive Requests**

We will make every effort to comply with your request, however, we are not obliged to do so if it is manifestly unfounded or excessive. Alternatively, we may agree to your request but will charge a reasonable fee. A request is considered unfounded or excessive, for example, if it is a repeat request that we have already responded to. We will notify you if your request is excessive and whether or not we will respond or charge. We will also charge for additional copies of any requests. Charging fees are based on the additional administrative cost to the Company.