



KISIMUL GROUP

GDPR Policy and Procedure Data Subject Access Request Policy

People have the right to receive a copy of the information that Kisimul Group hold about them. This is known as a subject access request. The right of subject access means that you can make a request under the GDPR for Kisimul Group to supply you with copies of your paper and computer records and related information.

1 Organisational arrangements

- 1.1 **Fee:** Kisimul Group will not charge Data Subjects to make data subject access request (“SAR”), unless it is ‘manifestly unfounded or excessive’, in which case we may charge a reasonable administrative fee.
- 1.2 **Excessive requests:** if a request is ‘manifestly unfounded or excessive’ Kisimul Group may charge a fee or refuse to respond, and will provide evidence of how the conclusion that the request is manifestly unfounded or excessive was reached.
- 1.3 **Electronic access:** When Data Subjects make a request electronically, Kisimul Group will provide the information in a commonly-used electronic form, unless otherwise requested by the data subject.
- 1.4 **Content of response:** Kisimul Group will allow Data subjects to know what information is held about them and what processing is being carried out. In responding to a request, Kisimul Group will provide further information such as the relevant data retention period and the right to have inaccurate data corrected.
- 1.5 **Time to respond:** Kisimul Group will respond to Data Subjects requests for information within a month. We may extend the period of compliance by a further two months where requests are complex or numerous. If this is the case, Kisimul will inform the data subject within one month of the receipt of the request and explain why the extension is necessary. We may also ask you for more information to clarify what you information you require.
- 1.6 **Right to withhold:** In line with GDPR, Kisimul Group may withhold personal data if disclosing it would ‘adversely affect the rights and freedoms of others’. This may extend to intellectual property rights and trade secrets.

2 Making a Data Subject Request

- 2.1 What information are you entitled to under the GDPR?

Under the GDPR, you have the right to obtain:

- confirmation that your data is being processed;
- access to your personal data; and
- other supplementary information that corresponds to the information provided in our privacy notice

The GDPR clarifies that the reason for allowing you access to your personal data is so that you are aware of, and can verify, the lawfulness of the processing.

2.2 Requests can be made by email to DPO@Kisimul.co.uk. Alternatively, a request can be made by letter to:
DPO, Kisimul Group, 61 High St, Swinderby, Lincoln LN6 9LU.

Cruckton Hall is a subsidiary of Kisimul School Holdings Limited and as such will adopt relevant policies, where appropriate, from Kisimul Group.

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