

SUBJECT ACCESS REQUEST PROCEDURE (TIER 2)

Document Control

Reference: GDPR DOC 2.2

Issue No: 1.0

Issue Date: 10/11/2023

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1. Scope

All personal data processed by Mr Marine Group BV is within the scope of this procedure.

Data subjects are entitled to obtain:

- Confirmation as to whether Mr Marine Group BV is processing any personal data about that individual;
- Access to their personal data;
- Any related information;

2. Responsibilities

- 2.1 The Data Protection Officer / GDPR Owner is responsible for the application and effective working of this procedure, and for reporting to the information owner on Subject Access Requests (SARs).
- 2.2 The Data Protection Officer / GDPR Owner is responsible for handling all SARs.

3. Procedure

- 3.1 Subject Access Requests are made using the Subject Access Request Record ([GDPR REC 4.2](#)).
- 3.2 The data subject provides Mr Marine Group BV with evidence of their identity, in the form of a current passport/driving license/ID, and the signature on the identity must be cross-checked to that on the application form GDPR REC 4.2.
- 3.3 The data subject specifies to Mr Marine Group BV specific set of data held by Mr Marine Group BV on their subject access request (SAR). The data subject can request all data held on them.
- 3.4 Mr Marine Group BV records the date that the identification checks were conducted, and the specification of the data sought.
- 3.5 Mr Marine Group BV commits to providing the requested information to the data subject within one month from the recorded date. However, it's important to note that, in accordance with GDPR Article 12(3), there may be circumstances where this response time can be extended by up to two additional months when necessary. Such extensions will be considered based on the complexity and number of requests received. In any case where an extension is required, Mr Marine Group BV will inform the data subject of the extension and provide reasons for the delay within one month of receiving the request.
- 3.6 Once received, the subject access request (SAR) application is immediately forwarded to the Data Protection Officer / GDPR Owner, who will ensure that the requested data is collected within the specified time frame in clause 3.4 above.

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Collection entails:

- 3.6.1 Collecting the data specified by the data subject, or
 - 3.6.2 Searching all databases and all relevant filing systems (manual files) in Mr Marine Group BV, including all back up and archived files (computerised or manual) and all email folders and archives.
- 3.7 The Data Protection Officer / GDPR Owner maintains a record of requests for data and of its receipt, including dates.
 - 3.8 The Data Protection Officer / GDPR Owner reviews all documents that have been provided to identify whether any third parties are present in it, and either removes the identifying third party information from the documentation or obtains written consent from the third party for their identity to be revealed.
 - 3.9 If any of the requested data is being held or processed under one of the following exemptions, it does not have to be provided:
 - National security
 - Crime and taxation
 - Health
 - Education
 - Social Work
 - Regulatory activity
 - Journalism, literature and art
 - Research history, and statistics
 - Publicly available information
 - Corporate finance
 - Examination marks
 - Examinations scripts
 - Domestic processing
 - Confidential references
 - Judicial appointments, honours, and dignities
 - Crown of ministerial appointments
 - Management forecasts
 - Negotiations
 - Legal advice and proceedings
 - Self-incrimination
 - Human fertilization and embryology
 - Adoption records
 - Special educational needs
 - Parental records and reports
 - 3.10 In the event that a data subject requests Mr Marine Group BV to provide them with the personal data stored by the controller/processor, then Mr Marine Group BV will provide the data subject with the requested information in electronic format, unless otherwise specified.

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- 3.11 In the event that a data subject requests what personal data is being processed then Mr Marine Group BV provides the data subject with the following information:
- 3.11.1 Purpose of the processing
 - 3.11.2 Categories of personal data
 - 3.11.3 Recipient(s) of the information, including recipients in third countries or international organisations
 - 3.11.4 How long the personal data will be stored
 - 3.11.5 The data subject's right to request rectification or erasure, restriction or objection, relative to their personal data being processed.
 - 3.11.5.1 Mr Marine Group BV removes personal data from systems and processing operations as soon as a request for erasure has been submitted by the data subject.
 - 3.11.5.2 Mr Marine Group BV contacts and communicates in written form with other organisations, where the personal data of the data subject is being processed, to cease processing information at the request of the data subject.
 - 3.11.5.3 Mr Marine Group BV takes the appropriate measures without undue delay in the event that the data subject has: withdrawn consent (GDPR-REC 4.6A); objects to the processing of their personal data in whole or part; no longer under legal obligation and/or has been unlawfully processed.
 - 3.11.6 Inform the data subject of their right to lodge a complaint with the supervisory authority and a method to do so (Complaints Procedure [GDPR DOC 2.9](#)).
 - 3.11.7 Information on the source of the personal data if it hasn't been collected from the data subject.
 - 3.11.8 Inform the data subject of any automated decision-making.
 - 3.11.9 If and where personal data has been transferred and information on any safeguards in place.
- 3.12 Mr Marine Group BV uses the following electronic formats to respond to SARs:
- PDF
 - Word Documents (.doc/.docx)
 - Excel Documents (.xls/.xlsx)

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Document Owner and Approval

The Data Protection Officer / GDPR Owner is the owner of this document and is responsible for ensuring that this procedure is reviewed in line with the review requirements of the GDPR.

A current version of this document is available to all members of staff on the company's shared drive and is published on the company's shared drive.

This procedure was approved by the Chief Operations Officer (COO) on *10/11/2023* and is issued on a version-controlled basis under his/her signature.

Signature:



Date: 14/11/2023

Change History Record

Issue	Description of Change	Approval	Date of Issue
1	Initial issue	Mihnea Radulescu	10/11/2023