Data Subject Rights Policy

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1 Introduction

CVQO Ltd, operating as Cadet Vocational College ("CV College"), will comply with requests from individuals exercising their rights under the General Data Protection Regulation (GDPR).

Under GDPR individuals have the following rights in relation to their personal data:

- The right to be informed.
- The right of access.
- The right to rectification.
- The right to erasure.
- The right to restrict processing.
- The right to data portability.
- The right to object.
- Rights in relation to automated decision making and profiling.

Each of these rights is set out in more detail in the following section.

CV College will handle any requests from a data subject to exercise these rights in accordance with this policy. CV College staff with relevant training will handle any requests from a data subject.

2 Rights

2.1 Right to be Informed

Individuals have the right to be informed about the collection and use of their personal data. This is a key transparency requirement under the GDPR. CV College addresses this right through its Privacy Policy and Privacy Notices.

2.2 Right of Access

Individuals have the right to request a copy of the personal data that CV College holds about them by contacting us through our website, email or by post (full details are shown below). Please note that there are exceptions to this right. We may be unable to make all information available to individuals if, for example, making the information available to individuals would reveal personal data about another person, if we are legally prevented from disclosing such information, if there is no basis for the individual's request or if it is manifestly unfounded or excessive.

2.3 Right to Rectification

We aim to keep individuals' personal data accurate and complete. We encourage individuals to contact us using the contact details provided below to let us know if any of their personal data is not accurate or changes, so that we can keep their personal data up-to-date.

2.4 Right to Erasure

Individuals have the right to request the deletion of their personal data where, for example, the personal data are no longer necessary for the purposes for which they were collected, where individuals withdraw their consent to processing, where there is no overriding legitimate interest for us to continue to process their personal data or their personal data has been unlawfully processed. If individuals would like to request that their personal data is erased they should contact us using the contact details provided

below.

2.5 Right to Restrict Processing

In certain circumstances, individuals have the right to request that we restrict the further processing of their personal data. This right arises where, for example, individuals have queried the accuracy of the personal data we hold about them and we are verifying the information, individuals have objected to processing based on legitimate interests and we are considering whether there are any overriding legitimate interests or the processing is unlawful and individuals elect that processing is restricted rather than deleted. If individuals would like to request that we restrict further processing of their personal data they should contact us using the contact details provided below.

2.6 Right to Data Portability

In certain circumstances, individuals have the right to request that some of their personal data is provided to them or to another data controller, in a commonly used, machine-readable format. This right arises where individuals have provided their personal data to us, the processing is based on consent or the performance of a contract and processing is carried out by automated means. If individuals would like to make such a request they should contact us using the contact details provided below.

2.7 Right to Object

In certain circumstances, individuals have the right to object to the processing of their personal data where, for example, their personal data is being processed on the basis of legitimate interests and there is no overriding legitimate interest for us to continue to process their personal data or if the individual's data is being processed for direct marketing purposes. If individuals would like to object to the processing of their personal data they should contact us using the contact details provided below.

2.8 Rights in Relation to Automated Decision Making and Profiling

CV College does not engage in automated individual decision-making (making a decision solely by automated means without any human involvement) or profiling (automated processing of personal data to evaluate certain things about an individual). If we did undertake such processing, individuals would have the rights to have information about the processing and to request human intervention or challenge decisions and we would have to carry out regular checks to make sure that our systems were working as intended.

3 Making a Request

Individuals who wish to exercise the rights set out in this policy should contact CV College's Data Protection Officer through our website www.cvcollege.org by clicking on Contact Us and completing an information request enquiry, by sending an email to dpo@cvcollege.org or by writing to the Data Protection Officer, CV College, 3 Archipelago, Lyon Way, Camberley, Surrey, GU16 7ER.

4 Handling a Request

On receipt of a request CV College will:

4.1 Verify the identity of the data subject

If needed, we will request any further evidence necessary to verify the identity of the data subject.

4.2 Verify the request

We will review the request to determine if it is sufficiently clear which rights are being exercised and what has been requested. If the request is not sufficiently clear, we will request additional information.

4.3 Verify whether requests are unfounded or excessive

We will consider the request to determine if it is unfounded or excessive, in particular, if it is repetitive in character. If this is the case we may refuse to act on the request or we may charge a reasonable fee.

4.4 Promptly acknowledge receipt of the request

We will promptly acknowledge receipt of the request and inform the data subject of the steps that will be taken and the expected time frame to deal with the request. This will be done on a timely basis and will not exceed one month to complete, unless the request is particularly complex, in which case we may advise the data subject that we will need additional time. The additional time required could be up to two additional months, but will only be extended by the time necessary to address the request.

4.5 Verify whether the data requested also involves data on other data subjects

If the data requested also involves other data subjects the data will be filtered before the requested data is supplied to the data subject. If the data cannot be filtered, we will seek the consent of other data subjects before supplying any such data.

4.6 Action the request

We will perform the appropriate action(s) according to the nature of the request, as set out in the table below:

Request	Action
The right of access	Provide the appropriate information (if the request was submitted in electronic form, any information should preferably be provided by electronic means as well)
The right to rectification	Correct the data
The right to erasure	Delete personal data
The right to restrict processing	Stop the specified further processing
The right to data portability	Provide the appropriate information (Note: if personal data is being processed on the basis of legitimate interest, the data subject does not have this right.)
The right to object	Stop all further processing

In the case of a request for access the information provided will include:

- the purposes of the processing;
- the categories of personal data concerned;

- the recipients or categories of recipients to whom personal data has been or will be disclosed, in particular in respect of transfers outside of the European Union, including any appropriate safeguards for transfer of data;
- where possible, the envisaged period for which personal data will be stored, or, if not possible, the criteria used to determine that period;
- the existence of the right to request rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing;
- the right to lodge a complaint with the ICO; and,
- if the data has not been collected from the data subject: the source of such data.

4.7 Confirm action taken

Advise the data subject that the request has been actioned or if not the reasons for this and explain that the matter is now concluded.