

Subject Access Request Policy

As a data controller with primary responsibility for, and a duty of care towards, the personal data within its control, publicjobs has certain obligations regarding how that data is processed and managed. Our obligations are set out in the legislative framework outlined in Section 2, above.

Data subjects whose personal data is held by publicjobs are entitled to ask and receive confirmation as to whether or not personal data concerning them is being processed. Where that is the case, data subjects are entitled to access their personal data. Data subjects may also avail of the following rights in relation to their personal data;

- To be advised of the purpose(s) of processing said data
- To be advised of the recipients or categories of recipients to whom personal data has been or will be disclosed
- Where possible, to be advised of the envisaged period for which personal data will be stored, or if not possible, the criteria used to determine that period (e.g. if the information will be provided to the National Archives)
- To request the rectification of personal data where it is incorrect or misleading
- To request the erasure of their personal data (where possible)
- To request to restrict the processing of their personal data, or to object to its processing
- The right to lodge a complaint with the Data Protection Commissioner
- To request, where the personal data is not collected from the data subject, any available information regarding the source of this data
- The right to be informed of the existence of automated decision-making (including profiling) being operated on the data subject's data (where relevant), to include meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject. At present, publicjobs does not carry out any automated decision-making
- To be advised of, where personal data is transferred to a third party, the appropriate safeguards pursuant to the GDPR relating to such transfer.



Individuals may exercise any or all of these rights by making a Subject Access Request (SAR).

Form of the Request

All requests for personal data are considered Subject Access Requests, but for the purposes of this policy publicjobs will focus only on those requests directed to the Data Protection Unit. An SAR should be made in writing and should include enough information to allow publicjobs to identify the data subject to our reasonable satisfaction (so we can verify that we are not releasing your data to someone who is impersonating you). A Subject Access Request Form available on publicjobs.ie in order to facilitate these requests and to advise the requester of the type of evidence required by publicjobs for verification purposes, though completion of this form is not mandatory in order for your request to be accepted. When your identity has been confirmed, we will be in a position to commence the work involved in responding to your request. We will try to respond as quickly as possible, and in any event without undue delay, but if we have not been able to complete your request within one calendar month we will update you as to the progress of our response and may request an extension. This occurs very infrequently in publicjobs as most requests are responded to within the statutory timeframe.

Communication

We will communicate directly with you, the data subject, once a valid subject access request has been received. This contact may help you identify the exact information you wish to receive. You can help us to respond to your request quickly by giving us as much information as possible about the data you are seeking access to and limiting the range, scope and time of data sources you wish us to search as much as possible. If you wish to receive a copy of everything we hold about you, then we will fulfil a complete and exhaustive search of all relevant data held by publicjobs.

We recognise that failure to respond to your request within the 30-day period set out in legislation gives rise to the ability of the individual to complain to the Office of the Data Protection Commissioner and may give rise to an investigation by the Commissioner. We will do our best to ensure that all subject access requests are handled efficiently and effectively at all times and we appreciate your co-operation and assistance in vindicating your rights under GDPR.



Systems Searches

Unless there is a legitimate option to reduce the scope of the request, a search of all databases and all relevant filing systems will be carried out throughout publicjobs. A response to the request will be directed, co-ordinated and provided by the Data Protection Unit, who have responsibility for issuing such responses.

STAR Process

publicjobs will organise the response to the request by giving one or more individuals (the Data Protection Liaison Officers) the responsibility for conducting searches of their relevant filing systems and databases. This information will be added to a secure file sharing system internally, and the Data Protection unit will engage with the relevant Teams to ensure a full response including all relevant personal data is issued.

Oleeo Process

The Data Protection Unit will be given access to the information held on the Oleeo platform which relates to you and will compile the information directly from that source. A Data Protection Liaison Officer will be asked to confirm that no other data relevant to your request is stored on the relevant Team's filing systems.

Manual Files

All relevant manual files (as set out in the Records Management Guidelines) will be searched for your data. This may include information held in the File Storage room within Chapter House, and records held in our secure File Storage location (provided by Iron Mountain). Records more than 30 years old and which have already been sent to the National Archives will not be included in our searches.

Restrictions following receipt of a request

Compliance with GDPR and related legislation is not intended to interfere with the normal running of publicjobs business, and so if following receipt of a valid request, we are made aware of inaccuracies or other issues in the data, publicjobs is permitted to make changes to the requested information in the normal course of operation (provided no changes are made



because of the request itself). This includes the correction of incorrect data, where discovered.

Personal Data relating to Third Parties

Once the personal data relevant to your request has been collected, we will consider our obligations to other data subjects who may be referred to in the same records. The person(s) preparing your response will consider the rights of third parties and any obligations of confidentiality which may apply, in addition to any relevant exemptions under GDPR. Where the identity of third parties would be disclosed in data which related to you, we may either blank out (redact) that data to protect the privacy and confidentiality of such third parties, or we may provide you with an extract from the data instead of the original source material.

Exemptions

Some material is exempt from inclusion in the response to a subject access request. This includes the content of negotiations with the data subject, and information which is subject to legal professional privilege. It also includes information relating to ongoing professional investigations or determination processes. If we are negotiating with you at the same time you make a subject access request, we do not have to reveal requested information if doing so would be likely to prejudice those negotiations. Once the negotiations are complete and put into effect, the requested information can be released.

Emails are subject to subject access requests, as are archived computerised and manual data held in a relevant filing system. CCTV footage will be included within the scope of request, where required.

Subject Access Requests cannot be used to infringe trade secrets or intellectual property rights. For this reason, we will not release test material or scoring keys to candidates as part of a Subject Access Request.

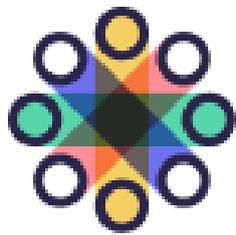
Where personal data contains health information, there may be a duty on publicjobs to consult an appropriate health professional before information can be disclosed. This is to avoid disclosing information about adverse health conditions to a data subject where the disclosure may be harmful or distressing to the data subject or another person. This does not apply where the data subject already had access to that information or supplied it to publicjobs directly.



Form of Response

We will provide you (the data subject) with any relevant data in response to a subject access request, via pdf documents attached to emails. If you do not wish to receive your response by email, please let us know in advance. Once the response to your subject access request has been finalised, we will make a full copy of the material to be retained for our own reference. These records will be used as a reference should there be any dispute as to the content or timeliness of the response provided. That file will be retained internally for seven years unless subject to a Data Protection Commission investigation (should you make a complaint following receipt of your information), in which case it will be retained indefinitely.

Any individual may apply at any stage (to the Data Protection Officer or the relevant Unit within publicjobs, as indicated in Section 2 above) to have any personal information held by publicjobs updated or corrected.



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