

LOSTOCK LEGAL SOLICITORS LTD

SUBJECT ACCESS REQUEST (SAR) PROCEDURE

UK GDPR Art. 15 | DPA 2018 | DUAA 2025 | Reference: LL-DP-005 | June 2026

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| Document Ref | LL-DP-005 |
| Version | 1.0 |
| Effective Date | June 2026 |
| Responsible Person | Data Protection Lead |

1. Purpose

This procedure sets out how Lostock Legal Solicitors Ltd handles Subject Access Requests (SARs) made by individuals under Article 15 of the UK GDPR. It takes account of the amendments introduced by the Data (Use and Access) Act 2025 (DUAA), including the updated standard for conducting searches and the clarified timescale obligations.

A SAR is a request by an individual to be told whether the Firm processes their personal data, and if so to receive a copy of that data along with supplementary information about how it is used. Any individual — whether a client, former client, employee, or third party — may submit a SAR.

2. The DUAA Amendment — Reasonable and Proportionate Search

The DUAA amended the UK GDPR to require that a controller conduct a 'reasonable and proportionate' search when responding to a SAR. This replaced previous uncertainty about the extent of searches required. In practice for the Firm, this means:

- We are not required to search every conceivable location if doing so would be disproportionate to the nature and scope of the request
- We must identify and search the locations where data relating to the requester is likely to be held
- We must document the search carried out and be able to justify its scope to the ICO if challenged
- We may take into account the requester's own description of what they are looking for when scoping the search

3. Receiving a SAR

A SAR may be submitted in any form — verbally or in writing, by email, post, telephone, or in person. There is no prescribed form and the individual does not need to use the words 'subject access request'. If someone asks what data the Firm holds about them, it must be treated as a SAR.

Any member of staff who receives a communication that may constitute a SAR must forward it to the Data Protection Lead immediately and on the same day. Staff must not attempt to respond to or assess a SAR themselves.

SAR Email

data@lostocklegal.co.uk

SAR PostData Protection Lead, Lostock Legal Solicitors Ltd, St Thomas House,
18 St Thomas Road, Chorley PR7 1HR

4. The SAR Process — Step by Step

1**Log and Acknowledge**

Record the SAR in the SAR log on the date received. Acknowledge receipt to the requester within 5 working days, confirming the date of receipt (which starts the clock) and the expected response date.

2**Verify Identity**

If there is any doubt about the identity of the requester, ask for reasonable evidence of identity before proceeding. Do not request excessive documentation. Pause the clock while awaiting ID — but minimise delays.

3**Clarify the Request (if needed)**

Where the request is broad or unclear, you may contact the requester to ask for clarification. The clock is paused while awaiting clarification. Do not use requests for clarification to delay or obstruct a SAR.

4**Conduct the Search**

Search all locations where data about the requester is likely to be held: case management system, email, paper files, HR records, accounts system, and any other relevant system. Document the search conducted and its scope.

5**Apply Exemptions**

Review the data found and consider whether any exemptions apply. Common exemptions in a legal context include: legal professional privilege; data relating to third parties whose rights would be prejudiced by disclosure; data subject to other legal professional obligations. Do not apply exemptions broadly — take a cautious approach and seek guidance if unsure.

6

Prepare the Response

Compile the response. It must include: confirmation that the Firm processes data about the requester; a copy of that data; the purposes of processing; the categories of data; recipients; retention periods; the requester's rights; and the right to complain to the ICO.

7

Respond Within Deadline

Send the response within one calendar month of receipt of the valid request (or the date identity/clarification was provided, if applicable). The deadline may be extended by a further two months for complex or numerous requests — but the requester must be notified within the first month.

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Record and File

Record the outcome in the SAR log. File a copy of the response and all workings. Retain for 3 years.

5. Timescales

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|---|--|--|
| Acknowledge receipt | Within 5 working days | No |
| Request identity verification (if needed) | Promptly — clock paused until received | Clock paused |
| Request clarification (if needed) | Promptly — clock paused until received | Clock paused |
| Full response | Within 1 calendar month of valid request | Yes — up to 2 further months for complex/numerous requests |
| Notify of extension | Within the first calendar month | Mandatory if extending |

6. Exemptions Relevant to Legal Practices

The following exemptions may be relevant when responding to SARs received by the Firm. Exemptions must be applied carefully and documented:

- Legal professional privilege — communications between lawyer and client made for the purpose of giving or receiving legal advice are exempt from disclosure under Schedule 2 DPA 2018
- Third party data — where the data of a third party would be disclosed, the Firm must consider whether it is reasonable to disclose without their consent; if not, the third party data should be redacted
- Crime and taxation exemption — where disclosure would prejudice the prevention or detection of crime, or the assessment of tax, data may be withheld

- Manifestly unfounded or excessive requests — the Firm may charge a reasonable fee or refuse to act on requests that are manifestly unfounded or excessive; the burden of demonstrating this is on the Firm

Any decision to apply an exemption must be documented and approved by the Data Protection Lead. The requester must be told if an exemption is being applied (though not necessarily the reason if doing so would prejudice the exemption's purpose).

7. No Fee — Standard SARs

Standard SARs must be responded to free of charge. A reasonable fee may only be charged for requests that are manifestly unfounded or excessive, or for additional copies of previously provided information. Any decision to charge a fee must be approved by the Compliance Partner and documented.

8. SAR Log

The Data Protection Lead maintains a SAR Log recording:

- Date received and channel
- Name and contact details of requester
- Date of acknowledgement
- Date identity verified (if applicable)
- Date clarification sought and received (if applicable)
- Deadline for response
- Date of response
- Summary of data provided / exemptions applied
- Whether any extension was notified

The SAR Log is retained for 3 years from the date of response and is available to the ICO upon request.