

DATA RECTIFICATION POLICY

1. Purpose

- 1.1 This document sets out our policy for ensuring the right of individuals to have inaccurate personal data rectified, or completed if it is incomplete, is enacted. The Data Protection Act 2017 states that personal data is inaccurate if it is incorrect or misleading as to any matter of fact.

2. How do you make a request to have inaccurate or incomplete personal data rectified / completed?

- 2.1 A request can be made either verbally or in writing to the Trust. If made in writing, this should be sent to the Trust's Lead for Data Protection at:

Eastlands Trust
Head Office
National Squash Centre
Etihad Campus
Manchester
M11 3FF
dataprotection@eastlandstrust.org

- 2.2 If you want to make the request verbally, you can call us on 0161 974 7837 or you can speak to any of our Operations Managers at any of our sites in person.

- 2.3 We will make a record of your request for rectification/completion, whether we receive your request in writing or verbally. This helps us to monitor our performance and identify any service level issues. We will keep this record in accordance with our Data Retention Policy.

3. What do we do when we receive a request?

- 3.1 We will first check that we have enough information to be sure of your identity. Often we will have no reason to doubt a person's identity, for example, if we have regularly corresponded with you or if you are making the request in person. However, if we have good cause to doubt your identity we can ask you to provide any evidence we reasonably need to confirm your identity. For example, we may ask you for a piece of information held in your records that we would expect you to know, a witnessed copy of your signature, or proof of your address.

- 3.2 We will check that we have enough information to find your records. If we feel we need more information, then we will promptly ask you for this.

- 3.3 You have the right to request restriction of the processing of your personal data where you contest its accuracy and we are checking it. As a matter of good practice, we will endeavour to restrict the processing of the personal data in question whilst we are verifying its accuracy, whether or not you have exercised your right to restriction.

Eastlands Trust

Head Office: c/o National Squash Centre & Regional Arena,
Etihad Campus, Gate 13, Rowsley Street, Manchester M11 3FF

Company Registration no.: 03747112

- 3.4 Once any queries around the information requested to be rectified/completed have been resolved, we will take the necessary action to rectify/complete the data.
- 3.5 If we are satisfied that the personal data we hold about you is indeed accurate, we will tell you that we will not be amending the data you have requested. We will explain our decision, and inform you of your right to make a complaint to the Information Commissioners Office (see below), and your ability to seek to enforce your rights through a judicial remedy.

4. Will we charge a fee?

- 4.1 In most cases, no, although please see paragraph 6 below.

5. What is the timeframe for responding to requests to rectify/complete your personal data?

- 5.1 We have one month starting from when we have received all the information necessary to identify you, to respond to your request. In many cases, it will be possible to respond in advance of the one month target, and we will aim to do so where possible.

6. Are there any grounds we can rely on for not complying with a request to rectify/complete personal data?

- 6.1 We can refuse to comply with a request for rectification if the request is manifestly unfounded or excessive, taking into account whether the request is repetitive in nature.
- 6.2 If we consider that a request is manifestly unfounded or excessive, we can either request a 'reasonable fee' to deal with the request, or we can refuse to deal with the request.

7. Our complaints procedure

- 7.1 If you are not satisfied by our actions, you can seek recourse through our internal complaints procedure, the Information Commissioners Officer, or the courts.
- 7.2 Our Chief Operating Officer will deal with any written complaint about the way a request has been handled and about what information has been disclosed. The Chief Operating Officer can be contacted at:

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Manchester
M11 3FF
Telephone: 0161 974 7837

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- 7.3 If you remain dissatisfied, you have the right to refer the matter to the Information Commissioner. The Information Commissioner can be contacted at:

Information Commissioner's Office Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
Telephone: 01625 545 745
Fax: 01625 524 510
Email: enquiries@ico.gsi.gov.uk

Next annual review date: 1st April 2019

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