

Portability Policy

Portability Policy

1. This policy relates to occasions when a data subject applies to receive data in order to reuse or, most commonly, transfer it to other data controllers. It refers to personal data that has been:-

- knowingly provided including contracts to which the data subject is a party
- acquired through our services to the individual
- processed by automated systems

It also relates where we are the receiving data controller following a portability request

2. Under The General Data Protection Regulation GDPR data subjects may request:-

- a copy of the personal data they have provided to us
- that we transmit the data to another data controller

The data subject identifies the personal data that is to be transmitted or provided for their own use.

3. The DPO is responsible for overseeing the transmission of the data without hindrance and ensuring that it is transmitted with the appropriate level of security, applying any appropriate risk mitigation measures and ensuring safeguards are in place so that all data transmitted are only those that the data subject has requested to be transmitted. Records of all this activity must be maintained.

4. Any portability request is immediately forwarded to the DPO to ensure that the requested data is provided/transmitted within the appropriate time frame. This will normally be within one month from the request date. If the request is complex, the time frame may be extended to a maximum of three months. We must inform the data subject of the reasons for the delay within one month of the original request.

5. The DPO will request that the data subject provide evidence of identity.

6. Where the data requested concerns a third party or parties, the DPO reviews whether or not the transmission of data to another data controller would cause harm to the rights and freedoms of other data subjects.

7. The requested information is provided to the data subject in a format that allows for the effective re-use of the data. The format used is recorded. When transmitting data to another data controller, we use an inter-operable format. If technical impediments prohibit direct transmission, we must explain these impediments to the data subject.

8. We accept and retain only data that is necessary and relevant to the service being provided.

9. We do not by default accept and process personal data received from another data controller following a personal data request; nor retain all the data received.

10. If data received contains third-party data, we retain the data under the sole control of the requested user, and manage it only for their needs.