

A SAR HAS ARRIVED. WHAT DO YOU DO FIRST?

Subject Access Request First Response Checklist · Practical technology guidance, not legal advice

One email can contain a SAR, a complaint, a marketing objection and an erasure request.

Log and link each issue — but do not merge their processes or deadlines.

1 RECEIVE

- ☐ Save the original request unchanged
- ☐ Note received date, time and channel
- ☐ Identify the person and their relationship
- ☐ Do not treat it as ordinary customer service

2 LOG

- ☐ Give the request a reference
- ☐ Name a responsible owner
- ☐ Record the normal one-month SAR deadline
- ☐ Record any separate complaint acknowledgement date

3 CLASSIFY

- ☐ Access request / SAR
- ☐ Data-protection complaint
- ☐ Direct-marketing objection
- ☐ Erasure request or another right

4 VERIFY

- ☐ Check identity only where needed
- ☐ Use known email or account access where suitable
- ☐ Ask for further evidence proportionately
- ☐ Avoid collecting unnecessary identity documents

5 CLARIFY IF NEEDED

- ☐ Is the scope genuinely broad or unclear?
- ☐ Ask promptly and specifically
- ☐ Clarification is not a delay tactic
- ☐ Check current ICO guidance on timing

6 SEARCH

- ☐ Map likely data systems and owners
- ☐ Include email, CRM, Teams, files and call logs
- ☐ Consider processors and approved messaging
- ☐ Search reasonably and proportionately

THE IT CLUB DATA MAP

DATA TYPE > SYSTEM > OWNER > PURPOSE > RETENTION > ACCESS

A SAR is much easier when you already know where personal data lives.

REVIEW, RESPOND AND KEEP THE EVIDENCE

Subject Access Request First Response Checklist · Use with current ICO guidance

7 REVIEW

- ☐ Check relevance and personal data
- ☐ Identify third-party information
- ☐ Consider necessary redaction or specialist advice
- ☐ Internal notes can still be personal data

8 REDACT

- ☐ Use proper redaction or export tools
- ☐ Do not rely on black highlighting
- ☐ Check hidden text and attachments
- ☐ Retain the reviewed response version

9 RESPOND

- ☐ Provide personal data and relevant context clearly
- ☐ Use a secure delivery method
- ☐ Keep marketing objections and erasure separate
- ☐ Do not create a new data breach while responding

10 RECORD

- ☐ Systems searched and staff involved
- ☐ Identity, clarification and review decisions
- ☐ Redactions, response date and delivery method
- ☐ Complaint, marketing or erasure outcomes

SAR READINESS: PEOPLE > PROCESS > PLACES > PROOF

CONTROLLED

Owner, procedure, data map and evidence are known.

REVIEW

Process exists but a change needs checking.

ACTION REQUIRED

A gap is known; assign an owner and date.

UNKNOWN

You cannot yet explain how you would handle the request.

KEEP THESE THREE RULES VISIBLE

DON'T PANIC. DON'T DELETE. DOCUMENT WHAT YOU DO.

IT Club can help with practical technology and process questions. It does not provide legal advice.