



Individual Rights Policy

Policy summary

CAA-UK (Computer Applications and Quantitative Methods in Archaeology) uses personal information to carry out the many functions connected to the running of our yearly conference and membership programme

CAA-UK therefore collect personal data required for or incidental to the discharge of its functions with the clear understanding that access and controls of such personal data belong to the data subject/s who have specific rights provided to them by data protection legislation.

This policy provides guidance on how CAA-UK will empower individuals to exercise their rights and facilitate the fulfilment of these rights in a transparent and effective manner in compliance with the legislation. CAA-UK will endeavour to ensure that in applying this policy, they will do so for the benefit of individual data subjects, and all with whom they come into contact, including National Chapters and external organisations.

Adherence to this policy is mandatory for all CAA-UK members, contractors, agency workers, consultants and volunteers who process personal data for CAA-UK.

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Introduction

1. The General Data Protection Regulation (GDPR) and the GDPR Implementation Act 2018 provide individuals with specific rights to control how their data is processed by CAA-UK, (with certain exemptions and restrictions):
 - a. The right to be informed
 - b. The right of access
 - c. The right to rectification
 - d. The right to erasure
 - e. The right to restrict processing
 - f. The right to data portability
 - g. The right to object
 - h. The right not to be subject to a decision based solely on automated processing or profiling
2. CAA-UK will comply with applicable legislation, and will empower individuals to exercise their rights, and will facilitate the fulfilment of these rights in a transparent, and supportive manner by advising applicants on how to make a request and assisting them in making the request. CAA-UK will endeavour to ensure that in applying this policy, they will do so for the benefit the individual data subjects, and all with whom they come into contact, including the wider Church and external organisations.
3. Each Local Organisational Team is a separate data controller but will apply this policy jointly. This does not mean that CAA-UK will act jointly to respond to requests.

Purpose

4. The purpose of this policy is to set out how CAA-UK will comply with requests by data subjects to exercise their rights as listed above (individual rights requests), including how exemptions will be applied. The policy also establishes the principles and mechanism which will be applied CAA-UK in fulfilling such requests, and how these will be applied to data that is shared or available with 3rd party organisations.

Scope

5. This policy applies to CAA-UK as listed, and to any separate legal entities owned and controlled by the.

CAA-UK

- Executive Steering Committee
- Steering Committee
- Scientific Committee
- Ethics Committee
- Bursary Committee
- Outreach Officer
- National Chapters
- Local Organisational Teams

6. CAA-UK require all those processing personal data on behalf of CAA-UK, including their suppliers, partners, contractors and agents, to act in accordance with this policy.

Definitions

- Data Subject** The individual to whom the data being processed relates.
- Personal Data** Any information that relates to an identifiable living individual.
- Data Controller** A body or organisation that makes decisions on how personal data is being processed. Each CAA-UK local organisational team are separate data controllers.
- Data Processor** These are parties that process data on behalf of a Data Controller, they do not have the ability to make any decisions about how the data should be processed. They must always be designated through a Contract or a Data Processing Agreement.

Policy

Policy Statement

7. In dealing with the processing of valid request(s) CAA-UK will be guided by the following principles:
- CAA-UK will be open and transparent with data subjects when communicating with them about their rights, including the provision of appropriate privacy notices.
 - CAA-UK will comply with the request unless exemptions or restrictions apply (See Appendix 1).
 - Where CAA-UK process a large quantity of information concerning the data subject, we will request that, before the information is delivered, the data subject specify the information or processing activities to which the request relates
 - CAA-UK will always provide an acknowledgement of the receipt of the request.
 - CAA-UK will accept requests by email, and social media.
 - CAA-UK will respond to the request in the timescales prescribed by the legislation, shown in the Timescales and response section below.
 - CAA-UK will provide a response in compliance with the duties placed upon it as Data Controller.
 - CAA-UK will support the individual to make the request clear to enable them to get the best possible response.
 - CAA-UK will facilitate the exercise of data subjects' rights in order to enable to them to make their request to the correct data controller.
 - CAA-UK will ensure that partner organisations or 3rd party processors are made aware of such requests and are expected to collaborate with CAA-UK and the data subject in order to fulfil them.
 - Failure to comply with Individual Rights Requests may put CAA-UK in breach of the legislation, and such failures may be investigated by the Data Protection Officer (DPO) and the UK Information Commissioner's Office, in the event of a complaint to them by the data subject.

Timescales and response

8. In responding to request(s) CAA-UK will meet the following timescales:
- Provide an acknowledgement of the receipt of any request within 5 working days of receipt
 - Provide a response as required by law and set out in the table below:

Individual Rights Request	Timescale
Right of access (Subject Access Request)	One calendar month
Right to rectification	One calendar month
Right to erasure	One calendar month
Right to restrict processing	One calendar month
Right to data portability	One calendar month
Right to object	One calendar month
Right to challenge automated decision making or profiling	Not specified, but without undue delay

9. Should there be an issue verifying the identity of the requestor there may be an impact on providing a response within the stated timeframes.
10. In some circumstances the response time may be extended by a further 2 months if the request is complex or there are numerous requests from the same individual.
11. CAA-UK will provide a written response to all requests in the same format as the request was received (except social media) or in the most secure method available to meet the needs of the data subject.
12. Where relevant and possible CAA-UK will provide remote direct access to the information or through electronic means, or by providing access to information on-site. Where this is not practical, for either technological or security reasons, the requestor will be provided with a copy of the information held by CAA-UK. This will usually be done electronically, depending on how the data is held, but in some instances, will be provided in hard copy either through direct collection by the requester or through secure email or secure postal delivery.
13. Where the data subject requests a specific format that is not required by the legislation, CAA-UK will endeavour to comply if no additional costs are associated with such provision e.g. purchase of specialised or proprietary formats, or disproportionate use of staff time. CAA-UK may charge a fee for complying with such a request.

Identification

14. An individual is only entitled to their own personal data, and not to information relating to other people (unless the information is also about them or they are acting on behalf of someone). If the personal data involves third party data, redaction of the information may be necessary. Advice should be sought from the Information Governance Officer, or a legal representative, where necessary.
15. CAA-UK will only comply with a request where they are able to verify that the person making the request has a legitimate right to do so, and whether the information requested falls within the definition of personal data as defined above. CAA-UK may

request additional information from the requestor in order to confirm their identity. We will let the individual know as soon as possible that we need more information from them before responding to their request. The period for responding to the request begins when we receive the additional information.

16. CAA-UK will not comply with requests where the identity of the requester cannot be verified.

Third party requests

17. CAA-UK will accept individual rights requests made by appropriate 3rd parties on behalf of a data subject. These may include:
 - Legal representative
 - Someone with legal power of attorney
 - A third party with the written and verified permission of the data subject.
18. CAA-UK reserve the right to check the identity of the requester and his/her authorisation to make the request and to receive the data.

Fees and Charges

19. CAA-UK will comply with a request free of charge. However, CAA-UK reserve the right to make a reasonable administrative charge if:
 - CAA-UK consider that the request is manifestly unfounded or excessive;
 - The request is a repeat of a previous request made, and to which CAA-UK has already fully responded; or
 - A request is made for a copy of information that CAA-UK has previously provided.
20. CAA-UK will contact the individual within one month of the date of receipt of a valid request, to inform them that a fee will be charged and will not comply with the request until payment has been received.

Data Processors

21. A request made by a data subject may, where relevant, include personal data held by 3rd party data processors who are working under the instruction of CAA-UK. Such data processors are obliged, insofar as this is possible, to assist the data controller(s) in responding to such requests.
22. CAA-UK will contact the relevant processor and provide either:
 - The details of the request and ask for copies of relevant personal data; and/or
 - Instructions on what actions to take in response to a request (e.g. amend inaccurate data).
23. CAA-UK will provide the requestor with details of a processor who holds their data.
24. CAA-UK will obtain from the processor confirmation that they have complied with a request or instruction within one month of their receipt of such a request.

Shared data

25. Data subjects have rights over their shared data, and these are not limited by data sharing arrangements. When a request includes data that have been shared by CAA-UK with other data controllers via an Information Sharing Agreement, CAA-UK will apply the principles as stated in the Information Sharing Protocol.
26. Where CAA-UK hold data received from another data controller who receives a request from a data subject, CAA-UK will apply the principles as stated in the Information Sharing Protocol.

Refusing a request

27. If a request has been refused, CAA-UK will inform the requester, within one month of the receipt of a valid request:
 - The reason for refusal;
 - The right to request a review by the DPO
 - That they have the right to make a complaint to the DPA;
 - That they have the right to apply to a court for a judicial remedy.
28. CAA-UK will also provide this information if they request a reasonable administration fee or need additional information to identify the individual.

Review and complaints

29. In the event of a refusal or a response which the data subject considers is unsatisfactory, the requestor may contact CAA-UK to request clarification or help with amending the request.
30. Should a response not meet the expectations of the requestor then a request for a review can be made to the Data Protection Officer.
31. Alternatively, the requestor is entitled to contact the Information Commissioner's Office (ICO) directly.
32. All responses issued by CAA-UK will contain the details of how a requestor may request a review or make a complaint.

Register

33. CAA-UK will keep a central register of all requests that will contain the following:
 - a. Name and contact details of the requester
 - b. The date of the request
 - c. The request made
 - d. The calculated date for the response
 - e. The actual date of the response
 - f. A description of the response
34. The register will be monitored by the Data Protection Officer, to check that timescales are being met.

Right of Access (Subject Access Request)

35. An individual has the right to access their personal data. This is commonly referred to as a "Subject Access Request" or "SAR". The individual is entitled to:
- confirmation that you are processing their personal data;
 - a copy of their personal data; and
 - other supplementary information which is contained in your privacy notice, but which you should be able to provide on request even if it has been published on a website, or previously given the data subject at the point of data collection:
 - the purposes of your processing;
 - the categories of personal data concerned;
 - the recipients or categories of recipient you disclose the personal data to;
 - your retention period for storing the personal data or, where this is not possible, your criteria for determining how long you will store it;
 - the existence of their right to request rectification, erasure or restriction or to object to such processing;
 - the right to lodge a complaint with the DPA or another supervisory authority;
 - information about the source of the data, where it was not obtained directly from the individual;
 - the existence of automated decision-making (including profiling); and
 - the safeguards you provide if you transfer personal data to a third country or international organisation.
36. Information may be redacted to protect the rights and freedoms of other individuals' whose data is included in the information requested.
37. CAA-UK will supply the information we hold when we send out a response, even if this is different to that held when we received the request, on the basis that the data may have been amended or deleted in the normal course of business. However, the existence of personal data, which had previously been deleted, on a back-up would not be considered as "being held" for the purposes of this policy.
38. Where data has previously been supplied to the data subject, but changes have been made to such data since, the original data supplied will be supplemented. This will not be considered as a repeat request if both requests are made with a reasonable intervening period between them.
39. CAA-UK will not amend or delete the data if it would not otherwise have done so.
40. It is an offence to make any amendment with the intention of preventing its disclosure, and CAA-UK may take action against any CAA-UK member who intentionally and willfully makes such an amendment.
41. CAA-UK will keep a copy of the information provided to the data subject for a period of 7 years from the date of response.
42. Generally, CAA-UK will not provide information under the right of access if:
- CAA-UK is not the data controller, or does not have authority from the data controller to release the information;
 - The information is not considered to be personal data;

- The data concerns another individual who can be identified from the information, including information identifying the other individual as the source of information and/or which CAA-UK reasonably believe the requestor is likely to possess or obtain, unless that person has consented to the disclosure or it is reasonable to comply without that person's consent.
- CAA-UK will determine whether it is reasonable to disclose the information with consent by having regard to the following circumstances:
 - The type of information that would be disclosed,
 - Any duty of confidentiality owed to the other individual,
 - Any steps taken by CAA-UK with a view to seeking the consent of the other individual,
 - Whether the other individual is capable of giving consent, and
 - Any express refusal of consent by the other individual.
- In certain circumstances it will be considered reasonable for CAA-UK to disclose information to a data subject without the consent of the other individual.

Right to rectification

43. An individual has the right to to have inaccurate personal data rectified or completed if it is incomplete.

The individual is entitled to:

- The rectification of personal data that is inaccurate if it is incorrect or misleading as to any matter of fact;
 - Have incomplete personal data completed;
 - Have confirmed in writing that recipients of the data have been informed of the request.
44. CAA-UK will ask the data subject to provide evidence of the alleged data inaccuracy and/or incompleteness.
45. When the data subject challenges the accuracy of their data CAA-UK will check if data held on the individual is accurate or needs to be rectified, taking account of the evidence of inaccuracy or incompleteness provided by the data subject.
46. CAA-UK will rectify inaccurate or incomplete data belonging to the data subject, or a supplementary statement will be added to the incomplete data, instead of an amendment to the existing data, depending on the purposes for the processing.
47. Generally, CAA-UK will not rectify data if:
- CAA-UK are content that the data is accurate, in which case the individual will be informed of their right to make a complaint to the DPA;
 - The request is either repetitive, excessive or is noticeably unfounded; or
 - The personal data must be maintained in its existing form for evidential purposes.
48. On receipt of a valid request, CAA-UK will restrict the processing of the personal data in question during verification of its accuracy.

49. Where possible CAA-UK will rectify the data held either electronically or on paper. Where this is not practical for technological or security reasons, or where CAA-UK are satisfied that the data is accurate, CAA-UK will provide the requestor with a supplementary document explaining their decision.

Right to erasure

50. An individual has the right to have their personal data erased if:
- The personal data is no longer necessary for the purpose which it was originally collected or processed;
 - Consent was the lawful basis for holding the data and the data subject has withdrawn consent;
 - CAA-UK are relying on legitimate interest as a basis for processing and the data subject objects to the processing of their data, and there is no overriding legitimate reason to continue this processing;
 - Personal data is being unlawfully processed as in the case of direct marketing and the individual objects to such processing;
 - It is necessary for compliance with a legal obligation to which CAA-UK are subject.

The individual also has the right to have confirmed in writing that recipients of the data have been informed of the request.

51. Generally, CAA-UK will not erase personal data in response to a request for erasure where processing is necessary for:
- Exercising the right of freedom of expression and information;
 - Compliance with a legal obligation or in defence of legal claims;
 - The performance of a task carried out in the public interest or the exercise of official authority;
 - For scientific, historical or research archiving purposes.
52. CAA-UK will restrict the processing of the personal data in question during verification of its accuracy.
53. CAA-UK will make all reasonable efforts to comply with the data subject's wishes where possible and will erase or otherwise remove the data held either electronically or on paper from the processing activity.

Right to restrict processing

54. An individual has the right to request the restriction of processing to their personal data. This is not an absolute right and only applies in certain circumstances, as follows:
- Where the accuracy of the personal data is contested by the individual and the controller is verifying the accuracy of the data;
 - Where personal data has been unlawfully processed and the individual requests restriction instead of erasure of their data;
 - Where the controller no longer needs the personal data but the data subject requests that the data be kept so as to establish, exercise or defend a legal claim;
 - Where the data subject has objected to processing of their personal data under Article 21(1) of the GDPR pending the verification of whether the legitimate grounds of the controller override those of the data subject.

The individual also has the right to have confirmed in writing that recipients of the data have been informed of the request.

55. Generally, CAA-UK will restrict the processing of the personal data in question whilst considering its accuracy or its legitimate grounds for processing the data in question.
56. CAA-UK will not process restricted personal data held under the right to restrict processing except to store it unless:
 - The data subject has given consent;
 - It is for the establishment, exercise or defence of legal claims;
 - It is for the protection of the rights of another individual;
 - It pertains to substantial public interest.
57. Where processing has been restricted, no processing of such personal data will be undertaken, except for storage and legitimate disposal.
58. Generally, where possible, CAA-UK will restrict processing of the data held either electronically or on paper. Where this is not practical for technological or security reasons, or in circumstances where the right to restriction does not apply, CAA-UK will provide the requestor with a written explanation for its decision.

Right to data portability

59. An individual has the right to obtain and reuse their personal data for their own purposes across different services, in order to move, copy or transfer personal data easily from one IT environment to another in a safe and secure way, without affecting its usability.
60. An individual is only entitled to data portability where:
 - The processing of personal data is based on the individual's consent **or** on the performance of a contract; and
 - the individual has provided personal data to the controller; and
 - processing is carried out by automated means (excludes paper files).

It does not include any additional data that CAA-UK have created based on the data an individual has provided.

61. In exercising his or her right to data portability the data subject shall have the right to have personal data transmitted directly from one controller to another where technically feasible.
62. CAA-UK will:
 - Provide portable data in a commonly used machine-readable format.
 - Transmit data directly to another organisation if the individual requests it and if it is technically feasible.
63. Generally, CAA-UK will not provide information under the right to data portability if:
 - CAA-UK is not the Data Controller or does not have the authority from the Data Controller to release the information, or
 - The information to be provided infringes upon the rights of another person.

Right to object

64. Individuals have the right to object to the processing of their personal data in certain circumstances, where:
 - Processing of personal data is based on legitimate interests or the performance of a task in the public interest;
 - Processing is for scientific research and statistical purposes.
65. Individuals have an absolute right to stop their data being used for direct marketing.
66. On receipt of a valid request CAA-UK will immediately stop processing the data in question.
67. CAA-UK will endeavour to resolve the reason for the objection, and if the data subject does not agree with the proposed resolution, cease processing their personal data.
68. The cessation of processing does not require CAA-UK to erase or delete data unless an erasure request has been made and agreed.
69. CAA-UK will decline a request under the right to object if:
 - CAA-UK can establish compelling legitimate grounds for the processing, which supersede the rights, freedom and interest of the data subject;
 - Processing is carried out for scientific, historical research or statistical purposes unless the processing is necessary for the performance of a task carried out in the public interest;
 - Processing is for the establishment, exercise or defence of legal claims; or
 - The cessation of processing infringes upon the rights of another person.

Rights relating to automated decision making and profiling

70. Individuals have the right to object to:
 - Decisions made about them solely by automated means without any human involvement;
 - Profiling due to automated processing of personal data to evaluate certain attributes about themselves;
 - Processing for scientific research and statistical purposes.

Individuals also have the right to:

- an explanation of the decision,
- challenge the decision, and
- if unsatisfied, to insist that the decision be made by a human being.

71. Generally, CAA-UK will:
 - Implement suitable measures to safeguard the data subject's rights and freedoms and legitimate interests, at least the right to obtain human intervention on the part of the controller, to express his or her point of view and to contest the decision;
 - Will carry out a Data Protection Impact Assessment (DPIA) to identify risk to individuals and show how it is going to deal with them in accordance with the legislation;
 - Have a record of the data subject's explicit consent (where relevant) and be able to show how and when consent was obtained.

72. CAA-UK will comply with a request for exemption from processing based solely on automated individual decision-making if the decision is:
- For contractual purposes between the individual and CAA-UK;
 - authorising CAA-UK by law to carry out processing under Article 22(1) GDPR;
 - Based on the data subject's explicit consent;
 - Necessary for reasons pertaining to significant public interest.

Restrictions

73. CAA-UK will apply restrictions concerning individual rights that are imposed by UK legislation, concerning public security, the protection of human life, the prevention, investigation and prosecution of criminal offences or the execution of criminal penalties, breaches of ethics for regulated professions, the substantial economic or financial interests of the UK, the keeping of public registers, or further processing of archived personal data for protection of the data subject or the rights and freedoms of others.
74. CAA-UK will apply restrictions and exemptions to individual rights as stated by the Data Protection Act 2018. These are listed in Appendix 2.
75. Where such restrictions apply, CAA-UK will inform data subjects that they are relying on such a national legislative restriction, unless doing so will prejudice the purpose of the restriction.

Responsibilities

Executive Steering Committee are responsible for the approval and implementation of this policy and related policies, for informing the trustees of current legislative requirements that may affect their criminal and civil liability and for ensuring that local organisational teams meet their responsibilities for fulfilling individual rights requests.

The Data Protection Officer is responsible for ensuring that individual information rights requests are effectively managed and that responses that fall outside the required timescales are reviewed and escalated where necessary; for establishing arrangements for independent reviews where required where complaints are made by data subjects or the DPA regarding individual rights or data processing; and for reviewing refusals and making determination on appeals relating to refusals.

The Information Governance Officer is responsible for: regularly reviewing and updating this policy and related policies in line with legislative or organisational changes and ensuring appropriate approval is received; publication and implementation of these policies across CAA-UK and making the policy and related policies and guidance available to DPA on request, without charge.

All CAA-UK members, contractors, agency workers, consultants and volunteers who have access to personal data held by CAA-UK are responsible for assisting colleagues who are responsible for individual rights requests by providing the necessary information or changes to the information or processing of that information in a timely way; and for ensuring that no deletion or amendment is made to such data to prevent disclosure.

APPENDIX 1 – Individual Rights and Lawful Bases

The table below indicates which rights the data subject can exercise depending on the lawful basis used for processing. It should be used as a general guide only, as each request must be considered on a case by case basis.

Individual Rights	Lawful basis (Article 6)					
	Consent	Contract	Legal obligation	Vital interest	Public interest	Legitimate interest
Withdraw consent	Yes	No	No	No	No	No
Be informed	Yes	Yes	Yes	Yes	Yes	Yes
Access	Yes	Yes	Yes	Yes	Yes	Yes
Rectification	Yes	Yes	Yes	Yes	Yes	Yes
Erasure	Yes	No	No	No	No	Yes
Restrict processing	Yes	Yes	Yes	Yes	Yes	Yes
Portability	Yes	No	No	No	No	No
Object	N/A	No	No	No	Yes	Yes
Automated decision making and profiling	N/A	No	No	Yes	Yes	Yes

Additional restrictions and exemptions are also listed in Appendix 2.

APPENDIX 2 – Exemptions from individual rights

CAA-UK may apply the following restrictions or exemptions from the GDPR as stated in the Data Protection Act 2018:

Exemptions from the GDPR

- Article 13(1) to (3): personal data collected from the data subject: information to be provided (Privacy Notice)
- Article 14(1) to (4): personal data collected from other sources: information to be provided (Privacy Notice)
- Article 15(1) to (3): confirmation of processing, access to data (SAR), safeguards for 3rd country transfers
- Article 16: right to rectification
- Article 17(1) to (2): right to erasure
- Article 18(1): restriction of processing
- Article 19: notification regarding rectification, erasure or restriction
- Article 20(1) and (2): data portability
- Article 21(1): objection to processing
- Article 5: general principles as these refer to the items listed above
- Article 5(1)(a): lawful, fair and transparent processing, other than lawful bases required in Article 6
- Article 5(1)(b): purpose limitation

Crime and taxation

Data processed for the purposes of:

- the prevention or detection of crime;
- the apprehension or prosecution of offenders, or
- the assessment or collection of tax

where the application of individual rights would be likely to prejudice these matters; and where CAA-UK are processing the data for any of these purposes or another controller obtains data from CAA-UK for the purposes of discharging its statutory functions.

Crime and taxation risk assessment

Data is processed for the purpose of the classification applied to a data subject as part of risk assessment, operated by a government department, a local authority or an authority administering housing benefit and, is processed for the purposes of:

- the assessment or collection of tax
- the prevention or detection of crime or the apprehension or prosecution of offenders where the offence concerns the unlawful use of public money or unlawful claim for payment of public money.

Specific exemptions from GDPR apply from those listed above.

Legal proceedings

Information that CAA-UK are obliged, by law, to make available to the public where the application of individual rights would prevent the controller from complying with that obligation;

Personal data where disclosure is required by order of a court or tribunal, where the application of individual rights would prevent the controller from making that disclosure;

Where disclosure is necessary for:

- the purpose of, or in connection with, legal proceedings or prospective legal proceedings;
- the purpose of obtaining legal advice; or
- the purposes of establishing, exercising or defending legal rights

where the application of individual rights would prevent CAA-UK from making the disclosure.

Protection of the rights of others

CAA-UK are not obliged to disclose information to the data subject as stated in:

- Article 15(1) to (3): confirmation of processing, access to data, safeguards for 3rd country transfers, and
- Article 5: general principles as these refer to the items listed above

where disclosure relates to another individual who can be identified from that information, unless:

- The other individual has consented, or
- It reasonable to disclose that information without consent

Restrictions to individual rights

CAA-UK may apply the following restrictions:

- Article 13(1) to (3): personal data collected from the data subject: information to be provided (Privacy Notice)
- Article 14(1) to (4): personal data collected from other sources: information to be provided (Privacy Notice)
- Article 15(1) to (3): confirmation of processing, access to data (SAR), safeguards for 3rd country transfers
- Article 5: general principles as these refer to the items listed above

Legal professional privilege

Where personal data consists of:

- information which falls under the claim to legal professional privilege, or
- information where a duty of confidentiality is owed by a professional legal advisor to a client.

Management forecasts

Where personal data processed for the purposes of management forecasting or management planning in relation to CAA-UK where the application of these provisions would be likely to prejudice the conduct of these business activities of CAA-UK.

Negotiations

Where personal data consists of records of the intention of CAA-UK in relation to negotiations with the data subject where the application of these provisions would be likely to prejudice those negotiations.

Confidential references

Where the reference is given, or is to be given, in confidence for the purposes of:

- the education, training or employment of prospective education, training or employment of the data subject,
- the placement or prospective placement of the data subject as a volunteer,
- the appointment or prospective appointment of the data subject to any office, or
- the provision or prospective provision by the data subject of any service.

Research, statistics and archiving

CAA-UK may apply the following restrictions where application of these provisions would prevent or seriously impair the achievement of the purposes in question:

Research and statistics

- Article 15(1) to (3): confirmation of processing, access to data (SAR), safeguards for 3rd country transfers
- Article 16: right to rectification
- Article 18(1): restriction of processing
- Article 21(1): objection to processing

So long as:

- The processing applies the necessary safeguards to the rights and freedoms of data subjects i.e. if it is likely to cause substantial hard or distress to data subjects; and
- Data minimisation has been appropriately applied using, for example, pseudonymisation; and
- Where the purposes can be fulfilled by further processing, this should be done in such a way as to no longer permit the identification of data subjects

Article 15(1) – (3) may be disapplied only where the result of the research or any resulting statistics are not made available in a form which identifies the data subject.

Archiving in the public interest

- Article 15(1) to (3): confirmation of processing, access to data (SAR), safeguards for 3rd country transfers
- Article 16: right to rectification
- Article 18(1): restriction of processing
- Article 19: notification regarding rectification, erasure or restriction
- Article 20(1) and (2): data portability
- Article 21(1): objection to processing

So long as:

- The processing applies the necessary safeguards to the rights and freedoms of data subjects i.e. if it is likely to cause substantial hard or distress to data subjects; and
- Data minimisation has been appropriately applied using, for example, pseudonymisation;