

Personal Data Correction Procedure

1. Scope of the Procedure

1.1 Purpose of the Procedure

Compliance with this procedure is required to ensure the University's compliance with data protection law and particularly the Data Protection, Privacy and Electronic Communications (Amendments etc) (EU Exit) Regulations 2019 ("the UK GDPR"), which give data subjects the right to request inaccurate personal data to be rectified and, in some circumstances, for additional data to be included where their personal data is incomplete ("Personal Data Correction Request"). Failure to comply with this legislation can result in financial penalties being levied against the University.

This procedure should be read in conjunction with the Privacy Policy.

1.2 What is covered by the Procedure

This procedure must be followed when a data subject challenges the accuracy of the personal data that is held by the University.

1.3 Who is covered by the Procedure

All those who access personal data held by the University, including staff, must familiarise themselves with this procedure and comply with it when dealing with personal data.

Failure to comply with the procedure will be dealt with in accordance with the Privacy Policy and may involve disciplinary action.

2. Detailed Procedures Statement

2.1 Any verbal or written challenge to the accuracy of a data subject's personal data should be notified immediately to the Data Protection Officer at dp_officer@aston.ac.uk, who will log the challenge.

2.2 It may be that the data subject is required to provide proof of identity. The University will not be able to process the Personal Data Correction Request if the data subject fails to provide proof of identity for whatsoever reason.

2.3 The Data Protection Officer (or their nominee) will contact relevant colleagues, who will take reasonable steps to verify the personal data held and rectify any inaccuracies (as required). During the verification process, all processing of the relevant personal data will be restricted and the University will identify whether the personal data has been processed by any authorised third parties. Any rectification will include reference to those third parties as required.

2.4 The Data Protection Officer (or their nominee) will notify the data subject of the outcome of the Personal Data Correction Request. The outcome notification will state that on the basis of the information provided by the data subject in the Personal Data Correction Request that either:

- the University believes the personal data held to be accurate and therefore will not be amended, or

- the University believes that the personal data held will need to be amended in order for that personal data to be accurate.

2.5 The data subject has a right of appeal in relation to the outcome of the Personal Data Correction Request. If the data subject remains dissatisfied of the outcome of the appeal, the data subject will be has the right to make a complaint to the Information Commissioner’s Office or another supervisory authority and their ability to seek to enforce their rights through a judicial remedy. The University will inform the data subject of this right without undue delay and within one month of receipt of their Personal Data Correction Request.

2.6 The Data Protection Officer may decide to treat the Personal Data Correction Request as manifestly unfounded or excessive and to either:

- request a reasonable fee to deal with the Personal Data Correction Request, or
- refuse to process the Personal Data Correction Request in accordance with the University’s statutory rights.

In either case this will be communicated to the data subject in accordance with the law. The data subject will be informed without undue delay and within one month of receipt of their Personal Data Correction Request.

2.7 The Data Protection Officer (or their nominee) records Personal Data Correction Requests and their outcomes on the Register of Personal Data Correction Requests.

3. **Version Control**

Reference No.	Version	Executive Sponsor	Officer Responsible	Consultation Process	Effective Date
DCP001	1	Chief Financial Officer	Head of Legal Services	GDPR Working Party	24 May 2018
DCP001	1.1	Chief Operating Officer	General Counsel	Chief Operating Officer	1 February 2019
DCP001	1.2	Chief Operating Officer	General Counsel	Information Security & Compliance Group	February 2021