



# **Subject Access Request Guidance and Request Form**

## **Gambling Supervision Commission**

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**Isle of Man**

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# Introduction

Article 15 of the [Data Protection \(Application of GDPR\) Order 2018](#), provides the right of access to personal data. The exercise of this right is commonly known as making a 'subject access request' (DSAR).

You have the right to request confirmation of whether we process your personal data, and if so, to access that data. This includes:

- A copy of your personal data (subject to any applicable exemptions).
- Information about how and why it is being used.
- Details of who it is shared with.
- How long we plan to keep it.
- Your rights in relation to that data, including correction, deletion, and objection.
- Information about any automated decision-making or profiling that may affect you.

We will respond to your request without undue delay and, in any event, within one calendar month of receipt. In cases where the request is complex or where multiple requests have been submitted by the same individual, this period may be extended by up to two additional months.

If an extension is necessary, you will be informed within one month of receipt of your request, along with the reasons for the delay. Wherever feasible, responses will be provided in electronic format, unless you have requested otherwise.

There is no fee for submitting a data subject access request. However, we reserve the right to charge a reasonable administrative fee in the following circumstances:

- Where requests are manifestly unfounded or excessive, particularly if they are repetitive in nature.
- Where you request additional copies of previously provided information.
- Where the request involves the reproduction of a previous response.

The Isle of Man Information Commissioner has published the following guidance which may assist you

- [Complying with a Subject Access Request](#)
- [Subject Access Request document library](#)

We will store basic Subject Access request for a maximum of 12 months from completion, unless there are any subsequent Commissioner appeals, tribunal or any resulting legal actions.

We do also maintain a basic log of all requests, and an outline of each response, to assist with any future applications. Please see the [GSC's privacy notice](#). For more information about how data is collected, used and retained.

# How to make a subject access request

A subject access request should ideally be made by completing the request form in this document and emailing it to [DPO-GSC@Gov.im](mailto:DPO-GSC@Gov.im).

Use of the form is not mandatory; however, it is designed to assist you in structuring your request and ensuring that all necessary information is provided. Requests may be made either verbally or in writing. If you choose to make a verbal request, it is strongly recommended that you follow up in writing to establish a clear record of correspondence. This can help demonstrate your intentions in the event of any dispute.

## **Proof of Identity**

To confirm your identity and ensure personal data is only shared with the correct individual, we may ask you to provide identification. If required, we will request the documents listed below.

### Photographic Identification

A certified copy of the photograph page of your current valid passport or national identity card which must have been certified within the last three months

### Proof of Address

Two certified copies of recent documents showing your name and residential address, dated within the last three months. Acceptable documents include:

- Utility bills
- Bank or credit card statements
- Rent book or tenancy agreement
- Other equivalent official correspondence

### Additional Documentation (if applicable):

- Evidence of the data subject's identity (if different from the requester)
- Written authorisation from the data subject permitting you to act on their behalf

## Correcting Information

If after you have received the information, you have requested, you believe that:

- the information is inaccurate or out of date; or
- we should no longer be holding that information; or
- we are using your information for a purpose which you were unaware.
- we may have passed inaccurate information about you to someone else.

Then you should notify the Data Protection Officer at once, using the contact details above stating the reasons you believe any of the above to be correct

# When a Request May Be Denied

The GSC may decline to act on a request or refuse access to personal data in the following circumstances:

- Where it is not reasonably able to identify the requester.
- Where the request is manifestly unfounded or excessive.
- Where there is a relevant exemption provided for in Schedule 9 of the the GDPR and LED Implementing Regulations 2018

One of the most common grounds for restriction is the need to protect the rights and freedoms of others. In such cases, the GSC may withhold specific information if its disclosure would reveal personal data relating to another individual, unless:

- That individual has provided their explicit consent to the disclosure, or
- It is deemed reasonable to disclose the information without that individual's consent.

Any decision to apply a restriction will be made on a case-by-case basis, considering the balance between your right of access and the other individual's rights. Where appropriate, the GSC will seek to provide as much information as possible by redacting or omitting any details that would identify the third party.

More information on the restriction of rights can be found on the Isle of Man Information Commissioners website here – [Restrictions on Rights](#)

## If You Disagree with the Outcome

If you are unhappy with how your request has been handled, or if you disagree with the outcome, you have the right to raise a concern or make a complaint.

### Step 1: Contact the GSC

You should first contact the Data Protection Officer at the GSC to discuss your concerns. We will review your case and aim to resolve the matter promptly and fairly.

Email: [DPO-GSC@Gov.im](mailto:DPO-GSC@Gov.im)

### Step 2: Escalate to the Supervisory Authority


If you remain dissatisfied after contacting the GSC, you have the right to lodge a complaint with the Information Commissioner for the Isle of Man.

Website: [Making a complaint](#)

Email: [ask@inforights.im](mailto:ask@inforights.im)

Phone: +44 (0)1624 693260

The Information Commissioner is the independent authority responsible for upholding information rights and enforcing data protection legislation on the Isle of Man.



# DSAR Request Form

## Section 1. Requestor Details

Title (Mr. Mrs. etc.)	
Surname/Family Name	
First Names	
Contact telephone number	
Contact email address	
Home Address & postcode	

## Are you the data subject?

<input type="checkbox"/>	Yes
<input type="checkbox"/>	No. I am acting on behalf of the data subject and have provided with this request the written authority from the data subject.

## Section 2. Details about the data subject (if different from section 1)

Title (Mr. Mrs. etc.)	
Surname/Family Name	
First Names	
Surname	
Date of Birth	
Contact telephone number	
Contact email address	
Home Address & postcode	

## Section 3. Previous Names or Addresses

If you were known to us under a different name or resided at a different home or business address during the period relevant to your request, please provide the details below. This will help us locate any personal data that may relate to you under those identifiers.

Previous name	
Previous residential address	

## Section 4. The Information you require

Please use the space below to provide further details that may help to locate the information sought. For example, specific documents or information that you are seeking and any relevant time periods. Alternatively use a separate page.

## Section 5. Declaration by the Requester

Please read and complete the following declaration. This section must be signed by the individual making the request, whether they are the data subject or acting on behalf of the data subject.

I declare that the information provided in this request is accurate and complete to the best of my knowledge. I understand that the Government Security Centre (GSC) may require proof of identity and/or authorisation before processing this request.

- ☐ I am the data subject named in this request.
- ☐ I am acting on behalf of the data subject and have enclosed appropriate authorisation.

**Name of requester:**

**Signature:**

**Date:**

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### Warning: Unlawful Access to Personal Data

It is a criminal offence under data protection legislation to knowingly or recklessly obtain or disclose personal data without lawful authority. This includes submitting a subject access request for personal data that you are not legally entitled to receive. Any attempt to mislead, impersonate another individual, or otherwise gain unauthorised access to personal data may result in legal action, including prosecution.

If you are acting on behalf of a data subject, you must provide valid and verifiable evidence of your authority to do so.

