**UW Privacy Office**

**Data Subject Requests**

**Checklist**

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A **data subject** is an individual about whom personal data has been collected. At the UW, data subjects may include students, employees, alumni, donors, event ticket holders, library patrons, and others. Data subjects may request actions, such as access to, correction of, or erasure of their own personal data in connection with a privacy related law, regulation or consumer right – these are called “**data subject requests**.”

This checklist is intended to help departments and units with the intake and handling of data subject requests. It includes discrete steps for receiving a request, verifying the identity of a data subject, locating relevant records, and engaging the UW Privacy Office.

**It is important for the UW to review a data subject request, determine next steps as described below, and respond in a timely manner. If the individual has rights under a specific law or regulation, then the UW may need to respond to the request within a certain timeframe. Note that UW may not be able to take action as proposed in a data subject request either because an individual may not have legal rights to make the request, OR because other laws (e.g., Records Retention) may constrain UW’s ability to take the action requested.**

This checklist assumes that data subject requests have been received via email either directly from the data subject or by way of the UW Privacy Office “Data Subject Request Google form.”  This checklist can be adapted to requests received in person, by phone, via physical mail, etc.

1. RECEIVING A DATA SUBJECT REQUEST

* Identify the nature and scope of the request. For example, correction of personal data associated with an application or erasure of personal data associated with a ticket purchase.
* Determine if the request is for access to or a release of records related to the Family Educational Rights and Privacy Act for Students. See “Services and Resources for Students” webpage: <https://registrar.washington.edu/students/>
* Determine if the request relates to access to protected health information maintained by UW Medicine. See “Access Medical Records and Images” webpage: <https://www.uwmedicine.org/patient-resources/access-medical-records-images>
* Determine if the data subject has asked to be removed or unsubscribed from a UW mailing list. If yes, direct the data subject to the [UW Preference Center](https://subscribe.gifts.washington.edu/SubscriptionManagement/). Ask the data subject to review options and respond back again if the UW mailing list of interest is NOT an option in the UW Preference Center.
* Determine whether the request relates to the [European Union’s General Data Protection Regulation](https://privacy.uw.edu/design/eu-gdpr/). If yes:
  + Make a note or set a reminder to complete the data subject response process no later than 30 days from the date of the data subject’s request.
  + Inform the UW Privacy Office of the data subject’s request.

1. IDENTITY VERIFICATION

* Determine the minimum personal data needed to verify the data subject’s identity. (See “Verify the identity of the data subject” section of the Data Subject Requests webpage.)
* Ask the data subject to provide the personal data needed for verification with the following message:

*“We have received your request. To review your request, we will need to verify your identity. Please provide the information listed below so we may check against our records for verification.*

* *[List personal data needed to verify the data subject’s identity]*

***DO NOT send your Social Security number.*** *We may follow-up with additional questions relating to verification and/or your request. Thank you for your help.”*

If the data subject provides personal data for verification:

* + Compare the data subject’s submitted personal data with relevant UW records.
  + Inform the data subject whether verification was or was not successful with the following messages:

*Successful Verification:*

*“Thank you for submitting the requested information. Your identity has been verified and your request is under review. We may follow-up with additional questions relating to your request.”*

*Unsuccessful Verification:*

*“Thank you for submitting the requested information. Unfortunately, verification of your identity was not successful. As such, your request has been closed. If you would like to reopen your request, please reply to this message with new and relevant information that you believe will verify your identity.* ***DO NOT send your Social Security number.”***

* + If the data subject does not provide personal data for verification, inform the data subject at the end of 30 days that the request could not be reviewed with the following message:

*“We received your request for [describe] on [date of request]. On [date that verification information was requested] we sent you an email asking for information to verify your identity. To date, we have not received a response from you. We are unable to review your request without first verifying your identity. As such, your request has been closed. If you would like to reopen this request, please reply to this email with the requested verification information.”*

***DO NOT share any personal data contained in UW records with the data subject until their identity is successfully verified.***

1. ENGAGE THE UW PRIVACY OFFICE BEFORE/WHILE LOCATING RECORDS

* Begin to locate UW records in your department or unit that are of the nature and within the scope of the request.
* Identify other departments or units that you believe may have UW records that are of the nature and within the scope of the request.
* Inform the UW Privacy Office of (a) the data subject request, (b) identity verification status, (c) UW records you have or have not yet located in your department or unit and corresponding retention requirements, and (d) other departments or units that may also have relevant UW records. Confer with the UW Privacy Office about whether or not the data subject has legal rights to make the personal data request under law, regulation or consumer right. The UW Privacy Office will advise on next steps.

***When emailing the*** [***UW Privacy Office***](mailto:uwprivacy@uw.edu) ***(uwprivacy@uw.edu) DO NOT send the UW records you have located in your department or unit; only indicate the kinds of records you have found.***

***In the interest of time, you do not need to locate all UW records before contacting the UW Privacy Office. The UW Privacy Office can advise on next steps while you continue to locate UW records.***