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 provides discrete steps intended to help UW units with the intake and handling of data subject requests. 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 directly from the data subject to a UW unit. This checklist can be adapted for requests received in person, by phone, via physical mail, etc.

1. Inform the data subject where and how to make a data subject request

* For personal data requests, go to <https://privacy.uw.edu/privacy/your-data/data-subject-request-form/>
* For access to or release of records in relation to Family Educational Rights and Privacy Act, go to <https://registrar.washington.edu/students/>
* For access to Medical Records and Images at UW Medicine, go to <https://www.uwmedicine.org/patient-resources/access-medical-records-images>
* To be removed or unsubscribed from a UW mailing list, direct the data subject to the UW Preference Center at <https://subscribe.gifts.washington.edu/>

UW departments or units with questions about responding to **a public records request rather than a Data Subject Request**, please contact the Office of Public Records and Open Public Meetings directly at <https://www.washington.edu/publicrecords/>.

1. Verify the data subject’s identity

* Determine the minimum personal data needed to verify the data subject’s identity.
* 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 either initially or after unsuccessful 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. Triage the data subject request

* Determine if the request relates to other UW departments or units.
* Determine if the request should be shared with or redirected to another UW department or unit.
* Determine if the data subject has privacy rights.
* If an individual references EU GDPR, try to glean from the request whether the personal data was initially provided to the UW while the data subject was physically located in the European Economic Area.
* If the request is a deletion request, determine if relevant UW records retention schedules (or other obligations) prevent deletion of the data relating to the request.
* Begin to locate UW records in your department or unit that are of the nature and within the scope of the request.

*Consult with the UW Privacy Office if you have questions or concerns about any of the steps in this section. 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.*

1. Consult the UW Privacy Office

* Promptly confer with the UW Privacy Office about whether the data subject has legal rights to make the personal data request under a privacy law, regulation or consumer right.
* Provide the information below to the UW Privacy Office via email at uwprivacy@uw.edu:
  + The date the request was received.
  + A copy of the request.
  + Identity verification status.
  + A description of the UW records you have or have not yet located in your department or unit.
  + Applicable UW records retention schedule(s) (if a request relates to the deletion of personal data).
  + A list of other departments or units that may also have UW records related to the request.

*DO NOT send the UW records you have located in your department or unit to the UW Privacy Office; only indicate the kinds of records you have found.*

1. Address the data subject request

* Determine what actions your department or unit may or may not be able to take to address the request.
* Document (on this checklist or in other tools or systems used to maintain records in your UW department or unit) the decisions regarding the actions your department or unit may or may not be able to take, the name of the person accountable for the decision, and the date of the decision.
* Proceed with those actions that your department or unit can take in connection with the request.
* Communicate to the data subject the actions taken to address the request.