



DSAR Policy – Introducer Appointed Representative (IAR)

Purpose

This policy explains what an Introducer Appointed Representative (IAR) must do if a customer asks to see, receive, or access their personal data. It ensures compliance with the UK GDPR and Data Protection Act 2018 while protecting the business and customers.

What Is a DSAR?

A Data Subject Access Request (DSAR) is a request from an individual (or someone acting on their behalf) to exercise one or more of their rights under data protection law.

A DSAR may include requests for:

- Access to personal data held about them
- A copy of their personal data
- Details of how their data is used, shared, and stored
- Correction of inaccurate or outdated data (Right to Rectification)
- Erasure of data in certain situations (Right to Erasure)
- Restriction of processing (Right to Restrict Processing)
- Objection to specific uses of their data (e.g., for marketing) (Right to Object)
- Data portability, i.e., to receive their data in a structured, machine-readable format (Right to Data Portability)
- No automated decisions without human involvement (Rights in relation to Automated Decision-Making and Profiling)

A DSAR does not have to mention the words "DSAR" or "GDPR" to be valid. Any such request must be taken seriously.

DSARs can be made via:

- Verbal request (e.g., in person or over the phone)
- Email or written letter
- Social media or other electronic messages

Your Role as an IAR

As an IAR, you must not handle DSARs yourself.

If you receive a DSAR, you must:

- Recognise it immediately
- Do not provide any data
- Do not explain timeframes or exemptions
- Escalate it immediately to the Jigsaw's Complaints Team.

You should confirm to the customer that their request will be passed on for formal handling.

What You Must Do If You Receive a DSAR

- Acknowledge politely - Thank the customer and confirm the request will be passed to the correct team.
- Escalate immediately - Forward the request to the Principal firm without delay.
- Preserve data - Do not delete, amend, or add to any records relating to the customer.

Timeframes (For Awareness Only)

- DSARs must be answered within one calendar month
- This may be extended by up to two additional months for complex requests
- Jigsaw will manage all deadlines and communications

Identity & Security

- Identity & Security
- Jigsaw will verify the requester's identity
- You must never release personal data directly

Exemptions & Refusals

- Some data may be lawfully withheld (e.g. third-party data or legally privileged information).
- Only the Principal firm decides whether an exemption applies.

Breach Awareness

If you believe personal data has been:

- Lost
- Sent to the wrong person
- Accessed without authority

You must report this immediately as a potential data breach.

Key Rule to Remember

If a customer asks for their data, stop and escalate. Do not respond yourself.