

Data Subject and Erasure Requests

One Financial Solutions Ltd

This procedure sets out how OFS identifies, verifies, manages and responds to Data Subject Access Requests (DSARs) and erasure requests under UK GDPR and the Data Protection Act 2018.

PURPOSE & SCOPE

This procedure applies to requests received from clients, prospective clients, former clients, employees, former employees and any other individual whose personal data the Firm processes. It applies to all staff, advisers and directors of OFS.

This procedure should be read alongside the Firm's Data Retention Policy, Consumer Duty Policy and Privacy Notice, which together govern how personal data is collected, retained and protected.

KEY DEFINITIONS

DSAR

A Data Subject Access Request — a request to confirm whether personal data is being processed and to obtain a copy of it.

Erasure Request

A request under Article 17 UK GDPR for the Firm to delete or remove an individual's personal data.

Data Subject

The identifiable living individual to whom personal data relates.

Data Controller

OFS, as the entity determining the purposes and means of processing personal data.

DPO / Data Protection Lead

The Compliance Director, responsible for oversight of data protection compliance.

ICO

The Information Commissioner's Office, the UK's independent data protection regulator.

WHAT COUNTS AS A REQUEST?

A request does not need to use the words "subject access request" or "erasure", name any legislation, or be made via a specific form to be valid. Any clear expression of a wish to see, receive, or have personal data deleted — whether in writing, verbally, by telephone, via social media, or through an authorised third party — must be treated as a formal request.

On receipt, the recipient must notify the Compliance Director within **one working day**, without responding substantively themselves.

ROLES & RESPONSIBILITIES

Compliance Director / Data Protection Lead

Acts as the central point of contact for all DSARs and erasure requests. Logs, verifies, coordinates and approves the Firm's response. Determines application of exemptions. Maintains the DSAR and Erasure Request Log.

All Staff and Advisers

Recognise a DSAR or erasure request in whatever form it is received and forward to the Compliance Director within one working day. Do not action, ignore or independently respond without Compliance Director involvement.

Board of Directors

Ultimate accountability for data protection compliance. Informed of any complex, high-risk or disputed requests, including any ICO referral.

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VERIFICATION OF IDENTITY

Before any personal data is disclosed or erased, OFS must take reasonable steps to verify the identity of the requester, proportionate to the sensitivity of the data involved. The clock for responding does not start until satisfactory verification has been received.

Acceptable verification may include:

- Confirmation of details already held on file (e.g. date of birth, address, account/policy number)
- A copy of photographic ID (passport or driving licence) where identity cannot otherwise be confirmed
- Evidence of authority to act where the request is made by a third party — e.g. a signed letter of authority, Power of Attorney, or Grant of Probate

SEARCH & RETRIEVAL OF DATA

On confirmation of a valid, verified request, the Compliance Director will coordinate a search for all relevant personal data across the Firm's systems, which may include:

- Back-office and client management systems
- Email accounts and correspondence files
- Physical client files and archived paper records
- Call recordings and meeting notes
- Adviser and paraplanner working files

Relevant staff and advisers must provide full and prompt cooperation with any search request from the Compliance Director, including searching their own email accounts and files where instructed.

TIMESCALES FOR RESPONDING

The Firm must respond to a verified DSAR or erasure request without undue delay and, in any event, within **one calendar month** of receipt (or of verification, if later).

This period may be extended by a further **two calendar months** where the request is complex or numerous. Where an extension applies, the Firm must inform the data subject within one calendar month of original receipt, explaining the reason for the delay.

Where a request is manifestly unfounded or excessive (for example because it is repetitive), the Firm may charge a reasonable administrative fee or refuse to act, provided the data subject is informed of the refusal, the reasons for it, and their right to complain to the ICO.

EXEMPTIONS, REDACTIONS & THIRD-PARTY DATA

Not all personal data held by the Firm must be disclosed in response to a DSAR. The following exemptions may apply and should be considered:

- Information that would reveal personal data relating to a **third party**, unless that third party consents or it is reasonable to disclose without consent
- Information subject to **legal professional privilege**
- Information that would prejudice an ongoing **FCA, ICO or other regulatory investigation**
- Management information or internal opinions that constitute confidential references, negotiations, or are otherwise exempt under the Data Protection Act 2018, Schedule 2
- Information already provided in response to a previous, identical request within a reasonable period

Where information is withheld or redacted, the Compliance Director must record the specific exemption relied upon in the DSAR Log.

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ERASURE REQUESTS — SPECIFIC CONSIDERATIONS

The right to erasure under Article 17 UK GDPR is **not absolute**. As an FCA-regulated firm, OFS is subject to statutory and regulatory record-keeping obligations that, in most cases, override a request for erasure. The Firm is generally required to retain:

- Suitability and advice records for a minimum period as set out in the Data Retention Policy (currently a minimum of **five years** for most advised business, and **indefinitely** for certain pension and lifetime mortgage advice)
- Records required to demonstrate compliance with Consumer Duty and other FCA rules
- Records relevant to actual or anticipated legal claims or regulatory enquiries

Where an erasure request is received, the Compliance Director must assess whether any retention obligation applies. Where it does, the Firm must:

- Decline to erase data to the extent necessary to meet that obligation;
- Explain clearly, in writing, the specific legal or regulatory basis for retention;
- Erase any data not subject to a retention obligation;
- Inform the data subject of their right to complain to the ICO.

FEES

No fee will normally be charged for a first DSAR or erasure request. A reasonable administrative fee may be charged only where a request is manifestly unfounded, excessive or repetitive. Any decision to charge a fee must be approved by the Compliance Director and communicated to the data subject in writing **before** any fee is collected.

TRAINING & REVIEW

All staff will receive training on recognising and escalating DSARs and erasure requests as part of their induction and ongoing compliance training programme.

This procedure will be reviewed at least annually by the Compliance Director, or sooner in response to changes in legislation, regulatory guidance, or following any significant incident or near-miss.

RESPONDING TO THE DATA SUBJECT

The response to a DSAR must be provided in a concise, transparent, intelligible and easily accessible form, using clear and plain language, and must include as applicable:

- Confirmation as to whether personal data is being processed
- A copy of the personal data held
- The purposes of processing, categories of data and recipients
- The retention period or criteria used to determine it
- The existence of rights to rectification, erasure, restriction, objection and to complain to the ICO
- The source of the data, where not collected directly from the data subject

Responses should normally be provided in the same format as the request was made, unless the data subject requests otherwise.

RECORD-KEEPING & AUDIT TRAIL

The Compliance Director will maintain the **DSAR and Erasure Request Log** as a permanent record of all requests received, actions taken, decisions made (including any exemptions applied or fees charged), and final outcomes.

This log will be made available to the Board and to compliance reviewers as part of routine monitoring, and to the FCA or ICO on request.

The log must record, as a minimum: the data subject's name, date received, channel, nature of the request, verification status, key dates (including the statutory deadline), actions taken, and outcome.

COMPLAINTS & ESCALATION

Where a data subject is dissatisfied with the Firm's response, they should be directed to the Firm's complaints procedure in the first instance. They also have the right, at any time, to lodge a complaint with the ICO:

Information Commissioner's Office

Website: ico.org.uk

Helpline: 0303 123 1113

Any request that is disputed, escalated, or potentially reportable to the ICO must be brought to the attention of the Board of Directors without delay.

Stay in Touch

One Financial Solutions Ltd

HOW TO CONTACT US

Please contact us if you have any questions about this procedure or about how we handle your personal data.

EMAIL

admin@one-fs.co.uk

POST

One Financial Solutions
Chapter House, 22 London Road
Reigate, Surrey, RH2 9HZ

CHANGES TO THIS PROCEDURE

We keep this procedure under regular review and will notify relevant staff of any updates when they occur. This procedure was last updated in June 2026.

COMPLAINTS

If you are unhappy with how we have handled your request, you have the right to lodge a complaint with the Information Commissioner's Office (ICO):

Information Commissioner's Office

Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF
ico.org.uk | 0303 123 1113