

DATA SUBJECT RIGHTS PROCEDURE

Versie 1.0
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FEDRUS INTERNATIONAL

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I. INTRODUCTION

The purpose of this document is to define the process to address data subjects' rights regarding their personal data within the Company.

Since the General Data Protection Regulation (hereinafter, the "GDPR") requires data controllers to allow individuals to exercise their rights of access, erasure, rectification, objection and portability in respect of their personal data, this document sets out further details regarding the response schedule to individuals' specific requests.

Individuals have the following rights in respect of their personal data:

- (i) **Access:** Individuals have the right to know what personal data the data controller processes about them, and to obtain a copy of that personal data.
- (ii) **Erasure:** Sometimes known as a "right to be forgotten", individuals have the right to have personal data erased if the data controller has no lawful basis to continue processing the data. In some cases, or for some types of personal data, the data controller may decide not to erase the data but instead restrict its use (for example, so it can only be used in the event of a legal claim).
- (iii) **Rectification:** Individuals have the right to have inaccurate data corrected and/or incomplete data completed with supplementary data.
- (iv) **Objection:** Individuals have the right to object to their personal data being used for a particular purpose, for example to send them direct marketing, customer profiling, or to make automated decisions.
- (v) **Restriction:** Individuals have the right to obtain from the data controller restriction of processing under certain circumstances (for example, when an individual disputes data accuracy, then personal data will be restricted for the period while personal data are verified).
- (vi) **Portability:** Individuals have the right to receive personal data *which they provided* to the data controller in a commonly used machine-readable format, so that they can share it with a different organization. On request, the data controller may be obliged to share such personal data directly with the third party.

Individuals are entitled to **make a written or oral request** to the data controller to exercise their rights. Requests from individuals to the data controller to exercise these rights are referred to as "Data Subjects' Rights Requests" (hereinafter, "**DSRRs**"). This remainder of this Schedule sets out further information on how each entity can meet its obligations in respect of DSRRs.

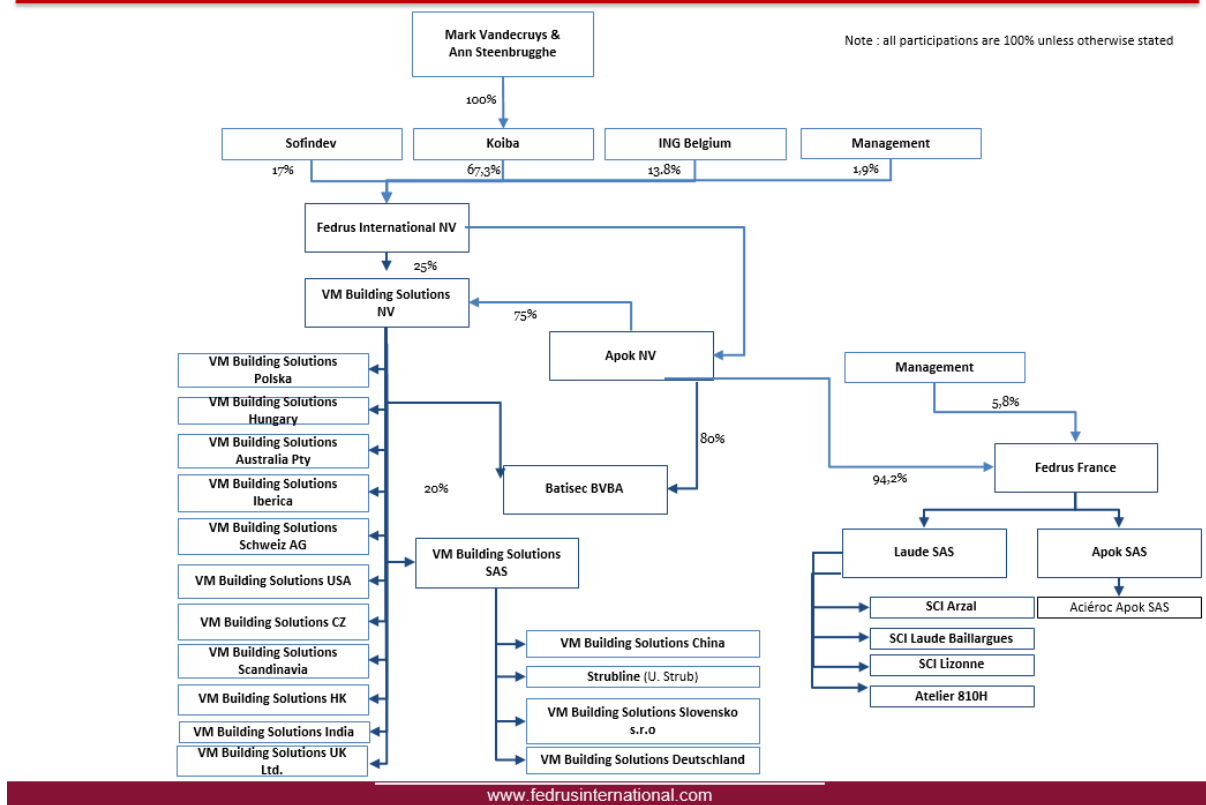
PART 1 of this Schedule applies to **all Personnel**. It explains what constitutes a DSRR, and the initial steps employees should take in case of receiving DSRR.

PART 2 applies only to those Personnel who are responsible for responding to DSRRs on behalf of each entity: the **DPO and the Human Resources Department** or the **Customer Care Department**, as appropriate.

II. SCOPE OF APPLICATION

The present document is applicable to each entity within the FEDRUS INTERNATIONAL GROUP, which is composed by the following legal structure:

Legal structure of Fedrus Group (1 June 2020)



Each of these entities will be named separately as the “organization”.

III. DEFINITION OF DATA SUBJECTS' RIGHTS REQUEST (DSRR)

Broadly speaking, any request by an individual regarding their personal data is a DSRR. DSRR can be received via phone, email, post, social media, or made orally to a member of the staff. The request does not have to refer to data protection law or "personal data". However, DSRRs should not be confused with normal, day-to-day customer service queries about an individual's subscription or service, and similarly day-to-day queries from employees to the HR team.

The conditions as to whether the organization has to comply with the request will vary depending on which right is being exercised, and the specific conditions for each right are explained in further detail below. In some cases, the individual may be seeking to exercise more than one right, and the organization may be able to comply with one aspect of a request (e.g. granting access), but not another (e.g. erasure).

The organization must respond to a DSRR within **one month**. If the request is particularly complicated, this can be extended to **two months**, but the organization must still respond to the requestor within one month, explaining why the extension is needed. For this reason, it is very important to keep a record of the date the DSRR was received.

Note that the organization is no longer entitled to refuse to act on the request, unless the request is manifestly unfounded or excessive, in particular because of its repetitive character, for example because the organization has responded to an identical request within the last two months and no new personal data has been collected in the interim.

IV. STEPS TO BE FOLLOWED WHEN RECEIVING A DSRR

STEP 1: INFORM THE DPO (if applicable) AND THE DEPARTMENT RESPONSIBLE FOR RESPONDING DSRRs

Data subjects request will be centrally managed by the Human Resources and Customer Care Departments, as long as information clauses provided to data subjects establishes that personal data subject rights shall be exercised by sending a communication to such Departments. However, any employee of the organization is subject to receive a DSRR in their daily work.

If an employee receives a DSRR, he/she must inform the Human Resources Department (in case the requestor is a candidate or an employee) or the Customer Care Department (in case of all other requestors) immediately and, in any event, within **72h of the receipt of the request by email**. The Department concerned must acknowledge receipt in writing within 72h of the receipt of the request. Such Department shall also bring to the notice of the DPO the receipt of the request within 72h, who must also acknowledge receipt by email within 72h.

Once the Department concerned and the DPO (if applicable) have been informed, the following steps in this Schedule shall be carried out by them. It is therefore very important that employees comply with Part 1 and inform the relevant staff as soon as possible in the event a DSRR is received.

PART 2: APPLICABLE ONLY TO THE DPO AND THE DEPARTMENT CONCERNED

STEP 2: CONFIRM THE IDENTITY OF THE REQUESTOR

When receiving the DSRR directly or from an employee of the organization, the Department concerned must be satisfied that it comes from the data subject, or someone authorized to act on their behalf.

In this context, the way to identify the requestor's identity shall consist of asking for a copy of the front of the ID (such as a national identity card or passport copy) or an electronic signature. If the requestor is not the data subject, but is acting on his/her behalf, the Department concerned should ask for a Power of Attorney or other proof of authority.

The data subject shall not be asked for more information than the minimum reasonably and necessary to identify him/her. If the requestor is an employee, you may not need any additional information to verify their identity.

Oral requests

DSRRs can be made orally (e.g. to a call centre or in person). If the DSRR was received orally, the Department concerned should ask the data subject to send the request in writing (e.g. by sending an email). However, the Department cannot require the data subject to send a written request nor refuse to respond to DSRRs which are only made orally. However, it should be explained to the requestor that it is easier to respond to written requests, provided the response will be dealt more diligently and more quickly. Written requests also help to verify the data subject's identity, as the requestor may include a copy of their ID attached to his/her request.



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Although the data subject refuses send a written request, the organization should send the individual a written communication as soon as possible confirming the nature and scope of their request, so that those circumstances are documented and evidenced.

STEP 3: IS THE DSRR CLEAR?

The next step is for the Department Concerned is to consider if the request contains sufficient information to be able to understand and consider the request. Is it sufficient for you to be able to find the personal data the individual is asking about? If the DSRR is too general/unclear, you should ask the individual promptly for the additional information reasonably required to fulfil the request.

STEP 4: IDENTIFY THE INFORMATION

The next step is to identify which systems and databases may contain information relating to the individual and the business units or departments which are responsible for those systems and databases.

This will depend on the nature of the information requested. However, it is likely that the Department concerned and the relevant business units will have to work with the Business Technology Department in order to identify the relevant databases or systems that hold documents and information electronically.

The business units responsible for each database and/or system will then need to carry out searches for any information which relates to the individual. Once these searches have been completed by the relevant business unit, that business unit should provide a copy of any information identified to the Department concerned for inspection.

STEP 5: REVIEWING THE INFORMATION TO IDENTIFY PERSONAL DATA

Once the information has been identified and received from the relevant business units, the Department concerned shall review the information in order to identify any personal data which relates to the data subject.

As part of this review, the Department Concerned should also flag any/all information that the organization would not wish to disclose outside the company, for example, information that is commercially sensitive or critical of the individual or another person. The next step is then to determine whether any such information may be withheld or erased.

STEP 6: PROVIDE THE RESPONSE

If the Department concerned have decided to refuse a DSRR (either in its entirety or in respect of a specific right), the response will need to set out the reasons for refusing the request.

If the request is made via email, the response should provided via email (or if the individual has requested an email response). In other cases, however, the response can be sent via post.

V RIGHT OF ACCESS

The data subjects have the faculty to gather information about whether their own personal data are being processed¹, the purpose of such processing activity, the origin thereof and the assignments or communications made or that are expected to be made. The GDPR recognizes the right to obtain a copy of the personal data that is being processed and introduces the possibility of fulfilling this right by facilitating remote access to a secure system that offers the data subject direct access to their personal data.

Requirements of the request

- Request addressed to the data controller by any means that guarantees the data subject identification (ID card number, electronic signature or other analogous means)² and, where appropriate, identification of the person who represents him/her together with the document proving such representation.
- Unless in cases of special complexity, the data subject is entitled to refer to his/her query both to specific data or to all the data submitted to the data controller's processing. In spite of the above, in the event that the organization handles a large amount of information about a data subject, the organization may ask the interested party to specify the information referred to in his/her access request.
- The request in which the application is specified must contain the address for the purposes of notifications, date and signature of the applicant, along with a photocopy of the ID card number.

Means of communication

- The data subject must be offered a simple and free mean to exercise their right of access.
- If there is a customer care service, the data subject must be given the opportunity to exercise their right of access through this service, identifying themselves by the means established for the customer's identification.

What should the data controller do?

- Upon a request, the data controller will resolve within a maximum period of one month from the receipt of the request. Therefore, given the shortness of the term and the entity of the penalties for breaching it, the person of the Company who receives the request must observe, first, when the request has arrived, and secondly, the time remaining for the completion of the request term. The period of one month goes from date to date, so that if the application has arrived on January 5, it must be responded to the maximum on February 5.
- The data controller must answer the request addressed to him, regardless of whether data processing of the data subject is carried out, and must use any reliable means to prove the content of such response and the date of its reception by the addressee; for example, by notarial means, telegram or burofax with acknowledgment of receipt and certification of content. In the event that the request does not meet the requirements described above, the data controller must request the rectification of the same.

¹ Processing: means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

² According to recital (64): The controller should use all reasonable measures to verify the identity of the data subject.



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- Likewise, the information that the data controller must provide will include: (i) the data or categories of data of the data subjects and those resulting from any elaboration or process thereof, (ii) as well as the origin of the data, (iii) the communications made or expected to be made (including the recipients or categories of recipients), (iv) the specification of the specific uses and purposes for which the data will be stored, (v) the expected period of conservation of data or criteria used to determine this term, (vi) the right to file a complaint with a supervisory authority, (vii) the existence of automated decisions, including the elaboration of profiles and significant information on the applied logic, as well as the importance and consequences for the individual and (viii) of the adequate guarantees regarding international transfers that are carried out.
- Finally, the information will be provided in a perfectly understandable way, without using codes or keys that require the use of specific mechanical devices.

Please, find the response model to the request regarding this right in **Annex 1**.

VI RIGHT TO ERASURE

This right is a manifestation of the data subject's will that their data shall be deleted and, therefore, cease to be processed.

Requirements of the request

- Request addressed to the data controller by any means that guarantees the data subject identification (ID card number, electronic signature or other analogous means)³ and, where appropriate, identification of the person who represents him/her together with the document proving such representation.
- Except in cases of special complexity, the data subject is entitled to refer in his/her query both to specific data or to all the data submitted to the data controller's treatment.
- The request in which the application is specified must contain the address for the purposes of notifications, date and signature of the applicant, along with a photocopy of the ID card number and it must be adapted to the circumstances described through art.17.1 GDPR, and may be denied when certain conditions are met (i.e. when it is necessary for the fulfillment of a legal obligation).

Means of communication

- The data subject must be offered a simple and free mean to exercise their right of access.

What should the data controller do?

- Upon a request, the data controller will resolve within a maximum period of one month from the receipt of the request. Therefore, given the shortness of the term and the entity of the penalties for breaching it, the person of the Company who receives the request must observe, first, when the request has arrived, and secondly, the time remaining for the completion of the request term. The period of one month goes from date to date, so that if the application has arrived on January 5, it must be responded to the maximum on February 5.
- The data controller must answer the request addressed to him, regardless of whether data processing of the data subject is carried out, and must use any reliable means to prove the content of such response and the date of its reception by the addressee; for example, by notarial means, telegram or burofax with acknowledgment of receipt and certification of content. In the event that the request does not meet the requirements described above, the data controller must request the rectification of the same.
- It is also important that the organization takes into account that, according to article 19 RGPD, those data controllers who have given access to personal data to a third party must adopt technical measures to inform the request of the data subject in deleting their personal information (unless it is impossible or requires a disproportionate effort).

Please, find the response model to the request regarding this right in **Annex 2**.

³ According to recital (64): The controller should use all reasonable measures to verify the identity of the data subject.



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VII RIGHT TO RESTRICTION OF PROCESSING

The restriction of processing means that, at the request of the data subject, the processing operations that in each case would correspond will not be applied to his/her personal data.

Requirements of the request

- Request addressed to the data controller by any means that guarantees the data subject identification (ID card number, electronic signature or other analogous means)⁴ and, where appropriate, identification of the person who represents him/her together with the document proving such representation.
- Except in cases of special complexity, the data subject is entitled to refer in his/her query both to specific data or to all the data submitted to the data controller's processing.
- The request in which the application is specified must contain the address for the purposes of notifications, date and signature of the applicant, along with a photocopy of the ID card number and it must be adapted to the circumstances described through art.18.1 GDPR.

Means of communication

- The data subject must be offered a simple and free mean to exercise their right of access.

What should the data controller do?

- Upon a request, the data controller will resolve within a maximum period of one month from the receipt of the request. Therefore, given the shortness of the term and the entity of the penalties for breaching it, the person of the Company who receives the request must observe, first, when the request has arrived, and secondly, the time remaining for the completion of the request term. The period of one month goes from date to date, so that if the application has arrived on January 5, it must be responded to the maximum on February 5.
- The data controller must answer the request addressed to him, regardless of whether data processing of the data subject is carried out, and must use any reliable means to prove the content of such response and the date of its reception by the addressee; for example, by notarial means, telegram or burofax with acknowledgment of receipt and certification of content. In the event that the request does not meet the requirements described above, the data controller must request the rectification of the same.
- When the processing of personal data has been restricted, such data may only be processed, with the exception of its conservation, with the consent of the data subject or for the formulation, exercise or defense of claims, or to protect personal data of another natural or legal person or for reasons of public interest. It is also necessary to take into account that the data subject that has obtained the restriction of processing will be informed by the data controller before the lifting of such restriction.

Please, find the response model to the request regarding this right in **Annex 3**.

⁴ According to recital (64): The controller should use all reasonable measures to verify the identity of the data subject.

VIII RIGHT TO DATA PORTABILITY

The right to Data portability is an advanced form of the right of access whereby the copy that is provided must be offered in a structured, commonly used, and machine-readable format ⁵.

Requirements of the request

- Request addressed to the data controller by any means that guarantees the data subject identification (ID card number, electronic signature or other analogous means)⁶ and, where appropriate, identification of the person who represents him/her together with the document proving such representation.
- Except in cases of special complexity, the data subject is entitled to refer in his/her query both to specific data or to all the data submitted to the data controller's processing.
- The request in which the application is specified must contain the address for the purposes of notifications, date and signature of the applicant, along with a photocopy of the ID card number and it must be adapted to the circumstances described through art. 20.1 GDPR.

Means of communication

- The data subject must be offered a simple and free mean to exercise their right of access.

What should the data controller do?

- Upon a request, the data controller will resolve within a maximum period of one month from the receipt of the request. Therefore, given the shortness of the term and the entity of the penalties for breaching it, the person of the Company who receives the request must observe, first, when the request has arrived, and secondly, the time remaining for the completion of the request term. The period of one month goes from date to date, so that if the application has arrived on January 5, it must be responded to the maximum on February 5.
- The data controller must answer the request addressed to him, regardless of whether data processing of the data subject is carried out, and must use any reliable means to prove the content of such response and the date of its reception by the addressee; for example, by notarial means, telegram or burofax with acknowledgment of receipt and certification of content. In the event that the request does not meet the requirements described above, the data controller must request the rectification of the same.
- [...], where appropriate, must transmit the corresponding personal data directly to the data controller in a structured format, in common use and easy to read, without due notice.

Please, find the response model to the request regarding this right in **Annex 4**.

⁵ The exercise of the right shall be understood without prejudice to the right to be forgotten. Such right will not negatively affect the rights and freedoms of others and will be applied to processing activities that are necessary for public interest or in the exercise of public powers conferred to the data controller.

⁶ According to recital (64): The controller should use all reasonable measures to verify the identity of the data subject.

IX RIGHT TO RECTIFICATION

This right allows the data subject to urge the data controller to rectify their data when it is incomplete or inaccurate, or inadequate or excessive, or if the processing activity does not comply with the Law.

Requirements of the request

- Request addressed to the data controller by any means that guarantees the data subject identification (ID card number, electronic signature or other analogous means)⁷ and, where appropriate, identification of the person who represents him/her together with the document proving such representation.
- Except in cases of special complexity, the data subject is entitled to refer in his/her query both to specific data or to all the data submitted to the data controller's processing.
- The request in which the application is specified must contain the address for the purposes of notifications, date and signature of the applicant, along with a photocopy of the ID card number and must adapt to the circumstances described through art.16 RGPD, and may be denied when certain conditions are met.

Means of communication.

- The data subject must be offered a simple and free mean to exercise their right of access.

What should the data controller do?

- Upon a request, the data controller will resolve within a maximum period of one month from the receipt of the request. Therefore, given the shortness of the term and the entity of the penalties for breaching it, the person of the Company who receives the request must observe, first, when the request has arrived, and secondly, the time remaining for the completion of the request term. The period of one month goes from date to date, so that if the application has arrived on January 5, it must be responded to the maximum on February 5.
- The data controller must answer the request addressed to him, regardless of whether data processing of the data subject is carried out, and must use any reliable means to prove the content of such response and the date of its reception by the addressee; for example, by notarial mean, telegram or burofax with acknowledgment of receipt and certification of content. In the event that the request does not meet the requirements described above, the data controller must request the rectification of the same.

Please, find the response model to the request regarding this right in **Annex 5**.

⁷ According to recital (64): The controller should use all reasonable measures to verify the identity of the data subject.

X RIGHT TO OBJECT

This right allows the interested party to object at any time to the fact that personal data concerning him or her are subject to a treatment based on the provisions of article 6.1 of the RGPD, including the preparation of profiles.

Requirements of the request

- Request addressed to the data controller by any means that guarantees the data subject identification (D.N.I, electronic signature or other analogous means)⁸ and, where appropriate, identification of the person who represents him/her together with the document proving such representation.
- Except in cases of special complexity, the data subject is entitled to refer in his/her query both to specific data or to all the data submitted to the data controller's processing.
- The request in which the application is specified must contain the address for the purposes of notifications, date and signature of the applicant, along with a photocopy of the D.N.I. and must adapt to the circumstances described through art.21 RGPD, and may be denied when certain conditions are met.

Means of communication

- The data subject must be offered a simple and free mean to exercise their right of access.

What should the data controller do?

- Upon a request, the data controller will resolve within a maximum period of one month from the receipt of the request. Therefore, given the shortness of the term and the entity of the penalties for breaching it, the person of the Company who receives the request must observe, first, when the request has arrived, and secondly, the time remaining for the completion of the request term. The period of one month goes from date to date, so that if the application has arrived on January 5, it must be responded to the maximum on February 5.
- The data controller must answer the request addressed to him, regardless of whether data processing of the data subject is carried out, and must use any reliable means to prove the content of such response and the date of its reception by the addressee; for example, via notarial mean, telegram or burofax with acknowledgment of receipt and certification of content. In the event that the request does not meet the requirements described above, the data controller must request the rectification of the same.
- The organization will stop processing personal data, unless it proves legitimate compelling reasons for the processing activity that prevail over the interests, rights and freedoms of the data subject, or for the formulation, exercise or defense of claims.

Please, find the response model to the request regarding this right in **Annex 6**.

⁸ According to recital (64): The controller should use all reasonable measures to verify the identity of the data subject.

ANNEX 1 Response model to the exercise of the right of access

[Place and Date] **[Mr. Franklin Note: Maximum 30 days after receipt of the request]**

Mr. / Mrs.....

Dear Mr/Mrs:

In response to your kind request and in compliance with Regulation (EU) 2016/679 of the European Parliament and of the Council, of April 27, 2016, regarding the protection of natural persons (hereinafter, the "GDPR") that in its article 15 guarantees the right of access, I am writing to you in my capacity as representative of **[...name of the company...]** (hereinafter **[...]**) with address at **[...]**, to certify the following points:

I.- In accordance with your request, we inform you that the personal data that **[...]** is currently processing in the framework of its activity are the following:

- **[Mr. Franklin Note: Introduce type of data that is being processed].**

II.- That, in accordance with your request, we provide you with the following information:

- That your data come from **[Mr. Franklin Note: must be completed according to the origin of the data, that is, the means by which the owner have provided their data].**
- That your information has been provided to **[Mr. Franklin Note: identification of the recipient category or individual / legal entity to which it has been assigned the data of the individual, provided that there has been an assignment of the data. In case of international transfers are carried out, include the adequate guarantees of art. 46 GDPR in this regard].**
- That your personal data was stored for **[Mr. Franklin Note: specify the specific uses and purposes for which the data were stored, as well as the existence of automated decisions, information on the logic and consequences for the data subject].**
- That your personal data will be stored until **[Mr. Franklin Note: if possible, specify the expected period of conservation of personal data or, if not possible, the criteria used to determine this term].**

III.- That the right of access has been taken care of by virtue of the provisions of article 15 GDPR, and you may file a claim with a control authority regarding data protection in case of disagreement.

IV.- That together with this communication we attach your information in electronic format of common use in accordance with section 3 of said article 15 GDPR **[Mr. Franklin Note: only in those cases in which the data subject submits the request by electronic means].**

For all these reasons, and given that **[...]** wishes to scrupulously respect the exercise of your rights, we inform you that we remain at your entire disposal for any clarification you may require.

Cordially,

Signature:

ANNEX 2 Response model to the exercise of the right of erasure

[Place and Date] _ [Mr. Franklin Note: Maximum 30 days after receipt of the request].

Mr. / Mrs.....

Dear Mr/Mrs:

In response to your kind request and in compliance with Regulation (EU) 2016/679 of the European Parliament and of the Council, of April 27, 2016, regarding the protection of natural persons (hereinafter, the "GDPR") that in its article 17 guarantees the right to erasure, I am writing to you in my capacity as representative of [...name of the company...] (hereinafter [...]) with address at [...], to certify the following points:

I.- That, in accordance with your request, we confirm that from the date of this communication, any processing of information of a personal nature related to your person has been excluded by [...].

II.- That the personal data processed in the processing operations which is erased, is the following:

- [Mr. Franklin Note: Introduce type of data processed]

III.- That the exclusion in the processing of your data has been carried out under the provisions of article 17 RGPD.

Cordially,

Signature:



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ANNEX 3 Response model to the exercise of the right to restriction of processing

[Place and Date]_ **[Mr. Franklin Note: Maximum 30 days after receipt of the request⁹]**

Dear Mr/Mrs:

In response to your kind request and in compliance with Regulation (EU) 2016/679 of the European Parliament and of the Council, of April 27, 2016, regarding the protection of natural persons (hereinafter, the "GDPR") that in its article 18 guarantees the right of the data subject to obtain from the controller the restriction of data processing, I am writing to you in my capacity as representative of **[...name of the company...]** (hereinafter **[...]**) with address at **[...]**, to certify the following points:

I.- That in accordance with your request, we confirm that from the date of this communication, we have proceeded to exclude from the processing activities certain personal data relating to your person by **[...]**.

II.- That the personal data affected by the restriction of processing are the following:

- **[Mr. Franklin Note: Introduce type of data about which the restriction will be produced].**

III.- That the exclusion in the processing of your data has been carried out under the provisions of article 18 RGPD.

IV.- That, despite the restriction of processing that occurs based on your request, **[...]** will continue to process the following data for **[Mr. Franklin Note: specify the specific uses and purposes for which the data are processed]:**

- **[Mr. Franklin Note: Introduce type of data that will continue to be processed].**

Cordially,

Signature:

⁹This period may be extended for another two months depending on the complexity and the number of applications. The data controller shall inform the data subject of such extensions within one month of receipt of the request, stating their reasons.

ANNEX 4 Response model to the exercise of the right to data portability

[Place and Date]_ **[Mr. Franklin Note: Maximum 30 days after receipt of the request ¹⁰]**

Dear Mr/Mrs:

In response to your kind request and in compliance with Regulation (EU) 2016/679 of the European Parliament and of the Council, of April 27, 2016, regarding the protection of natural persons (hereinafter, the "GDPR") that in its article 20 guarantees the right of data portability, I am writing to you in my capacity as representative of [...name of the company...] (hereinafter [...]) with address at [...], to certify the following points:

I.- In accordance with your request, we inform you that the personal data that [...] is currently processing in the framework of its activity are the following:

- **[Mr. Franklin Note: Introduce type of data that is being processed].**

II.- That, in accordance with your request, we inform you that we have proceeded to the direct transmission through a structured format, of common use and mechanical reading of the personal data already indicated to **[Mr. Franklin Note: Enter the name of the controller that the personal data has been transmitted].**

III.- That the right to data portability has been attended by virtue of the provisions of Article 20 RGPD.

For all these reasons, and given that [...] wishes to scrupulously respect the exercise of your right to data portability, we inform you that we remain at your entire disposal for any clarification you may require.

Cordially,

Signature:

¹⁰This period may be extended for another two months depending on the complexity and the number of applications. The data controller shall inform the data subject of such extensions within one month of receipt of the request, stating their reasons.

ANNEX 5 Response model to the exercise of the right to rectification

[Place and Date] **[Mr. Franklin Note: Maximum 30 days after receipt of the request ¹¹]**

Dear Mr/Mrs:

In response to your kind request and in compliance with Regulation (EU) 2016/679 of the European Parliament and of the Council, of April 27, 2016, regarding the protection of natural persons (hereinafter, the "GDPR") that in its article 16 guarantees the right of the data subject to rectify the incomplete / inaccurate personal data concerning him/her by the controller, I am writing to you in my capacity as representative of **[...name of the company...]** (hereinafter **[...]**) with address at **[...]**, to certify the following points:

I.- That in accordance with your request, we confirm that since the date of this communication, the personal data relating to your person has been rectified by **[...]**.

II.- That the personal data, once rectified, are the following:

- **[Mr. Franklin Note: Enter the personal data already modified]**.

III.- That the exclusion in the processing of your data has been carried out under the provisions of article 16 RGPD.

For all these reasons, and given that **[...]** wishes to scrupulously respect the exercise of your right of rectification of your personal data, we inform you that we remain at your entire disposal for any clarification you may require.

Cordially,

Signature:

¹¹This period may be extended for another two months depending on the complexity and the number of applications. The data controller shall inform the data subject of such extensions within one month of receipt of the request, stating their reasons.

ANNEX 6 Response model to the exercise of the right to object

[Place and Date] [Mr. Franklin Note: Maximum 30 days after receipt of the request ¹²]

Dear Mr/Mrs:

In response to your kind request and in compliance with Regulation (EU) 2016/679 of the European Parliament and of the Council, of April 27, 2016, regarding the protection of natural persons (hereinafter, the "GDPR") that in its article 21 allows the data subject to object at any time the processing of her/his personal data based on the provisions of article 6.1., including the elaboration of profiles, I am writing to you in my capacity as representative of [...] (hereinafter [...]) with address at [...], to certify the following points:

I.- That in accordance with your request, we confirm that since the date of this communication, the personal data relating to your person that has been excluded by [...] are the following:

- [Mr. Franklin Note: Enter type of data that will stop being processed]

II.- That the exclusion of your personal data from the processing activity has been carried out under the provisions of art. 22 GDPR.

For all these reasons, and given that [...] wishes to scrupulously respect the exercise of your right to object, we inform you that we remain at your entire disposal for any clarification you may require.

Cordially,

Signature:

¹²This period may be extended for another two months depending on the complexity and the number of applications. The data controller shall inform the data subject of such extensions within one month of receipt of the request, stating their reasons.

ANNEX 7 Model form to be completed by the data subject requesting the exercise of their rights

DATA OF THE CONTROLLER

Name/Company name: [...] Address/Service before which the right of access is exercised: C/Square
..... n° Postal Code City
..... Province Autonomous region
Identification Number

DATA OF THE DATA SUBJECT OR HIS/HER LEGAL REPRESENTATIVE

D./ D^a., over 18, with address in
C/Square n° Postal Code City
..... Province Autonomous region D.N.I.
....., of which accompanies copy, by means of this writing exercises the right of access,
in accordance with the provisions of articles 15 to 22 of Regulation (EU) 2016/679 of the European
Parliament and of the Council, of April 27, 2016, concerning the protection of natural persons (hereinafter,
the "RGPD"), and consequently,

REQUEST,

To provide him/her, without cost, the right of [●] within a maximum period of one month from the receipt
of this request, and to send the information by post to the address indicated above within thirty days
from the date of estimated resolution of the access request.

Specify the categories of data with respect to which the right is required to exercise

.....

Preferences / Additional questions in this respect

.....

Place Date.....

Signature:

ANNEX 8 Informing of the non existence of personal data of the data subject

[Place and Date]_ **Mr. Franklin Note: Maximum 30 days after receipt of the request**

Dear Mr/Mrs:

In response to your kind request and in compliance with Regulation (EU) 2016/679 of the European Parliament and of the Council, of April 27, 2016, regarding the protection of natural persons (hereinafter, the "GDPR"), I am writing to you in my capacity as representative of [...name of the company...] (hereinafter [...]) with address at [...], to certify the following points:

I. In accordance with your request, we confirm that [...] does not have any information of a personal nature relating to you or your representative and, therefore, it is not possible to exercise the right that you request.

For all these reasons, and given that [...] wishes to scrupulously respect the exercise of your rights, we inform you that we remain at your entire disposal for any clarification you may require.

Cordially,

Signature:

ANNEX 8 bis Communication model for formal defect in the request

[Place and Date]_ [Mr. Franklin Note: Maximum 30 days after receipt of the request]

Dear Mr/Mrs:

Under this communication, we acknowledge receipt of your [postal mail / email / entry in the form of the website of [...]] by which you request us to exercise your right to [Mr. Franklin Note: complete with the right exercised by the affected], regarding his/her personal data owned by [name of the company] (hereinafter, "[...]")

In this regard, we inform you that in order to exercise the right requested, and in order to provide a correct response to your request and also give full compliance to the obligations that correspond to [...], as data controller, current legislation on data protection Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons (hereinafter referred to as the "GDPR") states that *"where the controller has reasonable doubts concerning the identity of the natural person making the request referred to in Articles 15 to 21, the controller may request the provision of additional information necessary to confirm the identity of the data subject."* therefore, we describe below the information required in this regard [Mr. Franklin Note: request any documentation and / or information necessary for the correct exercise of the right in question, such as: a) name and surname; b) request in which the request is specified; c) address for the purposes of notifications - the e-mail would be enough, date and signature; d) documents accrediting the petition that it formulates, in its case, especially for the exercise of the right to object].

In this sense, [...] is obliged, in the event that the request of the claimed right does not meet all the legally established requirements, to request the rectification thereof within a period of thirty days from the date of receipt of this communication, since, otherwise, [...] could incur in an infraction, given the confidentiality and the very personal character inherent in the exercise of the right of access, which in any case require the verification of the applicant's identity. That is why, in case of not correcting the request within thirty days, it will be understood that the data subject has withdrawn his request and, if that's the case, should re-apply again later.

For all these reasons, please send us this documentation to the email address xxx@xxx.com indicating in the subject your name and surnames and the right you request; or by post to [...] with domicile for the purpose of exercising the right here requested at [...so that we can effectively respond to your request as soon as possible.

Cordially,

Signature: