

Data Subject Request Policy

1. Purpose

This policy outlines the process for handling data subject requests in relation to the rights of individuals under data protection laws, including the Right of Access, Right of Rectification, Right of Erasure, Consent, Right of Portability, and Right to Object.

2. Scope

This policy applies to all employees, contractors, and third-party service providers involved in the processing of personal data on behalf of Investor in Customers Ltd (IIC).

3. Definitions

3.1. Data Subject: An individual who can be identified, directly or indirectly, by reference to personal data.

3.2. Right of Access: The right of data subjects to obtain confirmation as to whether or not personal data concerning them is being processed, and, if so, access to that personal data.

3.3. Right of Rectification: The right of data subjects to request the correction of inaccurate or incomplete personal data.

3.4. Right of Erasure: The right of data subjects to request the deletion or removal of personal data where there is no compelling reason for its continued processing.

3.5. Consent: The lawful basis for processing personal data where the data subject has given consent for the processing of their personal data for specific purposes. Where data is processed on behalf of a data controller, under the legitimate interest provision in data protection law, consent will not be required.

3.6. Right of Portability: The right of data subjects to receive the personal data they have provided to a controller in a structured, commonly used, and machine-readable format and have the right to transmit that data to another controller.

3.7. Right to Object: The right of data subjects to object to the processing of their personal data in certain circumstances, such as direct marketing or for reasons arising from their particular situation.

4. Data Subject Requests Process

4.1. Receipt of Requests

Upon receiving a data subject request, the Data Protection Officer (DPO) or designated individual responsible for data protection within Investor in Customers Ltd (IIC) shall acknowledge receipt of the request without undue delay and within 5 working days of receipt. In the case of complex requests, or where multiple requests have been received from the same individual, this timeframe may be extended by one month, and the data subject shall be informed of any such extension and the reasons for the delay.

4.2. Verification of Identity

Investor in Customers Ltd (IIC) shall take all reasonable steps to verify the identity of the data subject making the request. Where requests are made electronically, Investor in Customers Ltd (IIC) may ask the data subject to provide additional information necessary to confirm their identity. Where Investor in Customers Ltd (IIC) is acting as a data processor on behalf of a data controller, Investor in Customers Ltd (IIC) will rely on the verification of identity by the data controller.

4.3. Right of Access

Where a data subject requests access to their personal data, Investor in Customers Ltd (IIC) shall provide a copy of the personal data being processed, free of charge. This information shall be provided in a commonly used electronic format, unless the data subject requests otherwise, within 5 working days of the acknowledgement of receipt referred to in clause 4.1.

4.4. Right of Rectification

If a data subject notifies Investor in Customers Ltd (IIC) that their personal data is inaccurate or incomplete, Investor in Customers Ltd (IIC) shall rectify the data within 5 working days of the acknowledgement of receipt referred to in clause 4.1. Where necessary, Investor in Customers Ltd (IIC) shall also inform any third parties to whom the data has been disclosed of any rectification made to the data.

4.5. Right of Erasure

Where a data subject requests the erasure of their personal data, Investor in Customers Ltd (IIC) shall erase the data within 5 working days of the acknowledgement of receipt referred to in clause 4.1 if one of the grounds specified in data protection laws applies, such as when the data is no longer necessary for the purposes for which it was collected or processed, or at the request of a data controller where Investor in Customers Ltd (IIC) is acting as a data processor on their behalf.

4.6. Consent

Where the lawful basis for processing personal data is based on the individual's consent, Investor in Customers Ltd (IIC) shall ensure that it processes personal data only in accordance with the consent given by the data subject. If a data subject withdraws their consent, Investor in Customers Ltd (IIC) shall cease processing the personal data to which the consent relates, unless there is another legal basis for the processing.

4.7. Right of Portability

Upon receiving a valid request from a data subject (or data controller), Investor in Customers Ltd (IIC) shall provide the personal data in a structured, commonly used, and machine-readable format, and shall, where technically feasible, transmit that data directly to another data controller specified by the data subject.

4.8. Right to Object

If a data subject objects to the processing of their personal data, Investor in Customers Ltd (IIC) shall cease processing the personal data unless there are compelling legitimate grounds for the processing which override the interests, rights, and freedoms of the data subject, or for the establishment, exercise, or defence of legal claims.

5. Documentation and Record Keeping

Investor in Customers Ltd (IIC) shall maintain a record of all data subject requests received, including the nature of the request, the actions taken to address the request, and any communications with the data subject. This documentation shall be retained in accordance with applicable data protection laws and may be made available to supervisory authorities or data controller upon request.

6. Training and Awareness

Investor in Customers Ltd (IIC) shall provide training and guidance to employees and individuals involved in handling data subject requests to ensure they are aware of their responsibilities and obligations under data protection laws.

8. Compliance and Accountability

Investor in Customers Ltd (IIC) shall regularly review and monitor its processes for handling data subject requests to ensure compliance with data protection laws and shall take appropriate measures to demonstrate compliance with the principles relating to the processing of personal data.

9. Non-discrimination

Investor in Customers Ltd (IIC) shall not discriminate against any individual for exercising their rights under data protection laws, including the rights of access, rectification,

erasure, consent,

portability, and objection.

10. Effective Date and Review

This policy shall be effective upon approval and shall be subject to periodic review and revision, as necessary, to ensure its ongoing effectiveness and compliance with applicable data protection laws.

This Data Subject Request Policy aims to ensure that Investor in Customers Ltd (IIC) processes data subject requests in a transparent, fair, and lawful manner while upholding the rights and freedoms of data subjects in accordance with data protection laws.

Approved by Investor in Customers Ltd (IIC):
17 Jan 2024 and will be reviewed 17 Jan 2025
Tony Barritt Director