

## 1. Introduction

This procedure outlines the process for individuals (data subjects) when exercising their rights to access, rectify, erase ("right to be forgotten"), restrict, withdraw consent or object to the processing of their personal data and the right to data portability and to be able to lodge a complaint if resolution can't be found, directly with the relevant supervisory authority (see Appendix A).

## 2. Submitting a data subject request (DSR)

Requests can be submitted verbally directly to the DCO (see contact details in Appendix B) or in writing by email containing the information below to [gdpr@danxcarousel.com](mailto:gdpr@danxcarousel.com)

1. **Your Details** (Data Subject) – Date of request, Full Name, Address, Email, Phone Number, the business function and region you are located.

2. **Proof of Identity** (needed for verification before any requests are processed) – A copy of a Passport, Driving License, National ID Card

3. **Nature of the request** (e.g. I am requesting access to the personal data that you hold for me for HR purposes and how long you retain it)

The data subject can choose to use a third-party for the purpose of a data request and will do so at their own cost.

## 3. Information you will need to provide DSR application

Please complete your Data Subject Rights application using the information below in the body of your application. The subject line should clearly state the request type (eg. withdraw consent, access, erasure etc.)

**To:** [gdpr@danxcarousel.com](mailto:gdpr@danxcarousel.com)

**Subject:** EG: Request for Access to Personal Data under Article 15 of the GDPR legislation

### 1. Your Details (Data Subject)

- Date of when you have requested this information.
- Full Name, Address, Email, Phone Number
- Which organization do you work for? *(Or state if not an employee)*

**Proof of Identity** (Please attach a copy of **one** of the following, this is needed for verification.)

- Passport, Driving License, National ID Card

**Details of the Request** (Nature of your request, typically listed below)

EG. I am requesting access to the personal data that your organisation holds about me. Specifically, I would like to receive:

A copy of my personal data, relating to:

- The purposes for which it is being processed
- The categories of personal data concerned
- The recipients or categories of recipients to whom the data has been disclosed
- The envisaged period for which the data will be stored
- Information about the source of the data (if not collected directly from me)
- Details of any automated decision-making or profiling
- (Optional) I am particularly interested in the following data.....

**Preferred Format for Response** (we will respond by email unless otherwise stated)

- Electronic (email)
- Hard copy (postal mail)

**Declaration** (Please acknowledge this declaration in your email, so we can verify this is for you)

I confirm that the information provided in this request is accurate and that I am the individual named above. I understand that you may need to verify my identity before processing this request.

## 4. How data subject requests are handled

Data subject requests are managed by the DCO (contact details can be found in Appendix B), supported by the CPO if required and to ensure full compliance. On receipt of a request, we will firstly acknowledge receipt of the request (usually within 48hrs), provide an expected timeframe for a response and complete the relevant verification checks.

The request will then be logged into our Wired Relations GDPR system and any further clarification needed will be requested.

We will classify the request by right type (e.g. access, erasure) and then proceed to identify and locate the relevant personal data or escalate if necessary.

We will check whether any exemptions or limitations apply and in the event the response is refused, inform the data subject via email with reason for refusal.

Where a response is due, this will be confirmed via email, including the right to complain to the relevant supervisory authorities and will be done within **one month**, extendable by **two months** for complex cases, data subjects will be informed via email if an extension is required within the first month.

As part of this response, we will raise a support ticket with the Tech support team to update any relevant systems or make a request directly if a third party, we will then close the request within our Wired Relations system.

## Appendix A: Supervisory authorities contact details

| Country            | Authority                                          | Website                                                                                                                       |
|--------------------|----------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------|
| Denmark            | Danish Data Protection Agency (Datatilsynet)       | <a href="https://www.datatilsynet.dk/english">https://www.datatilsynet.dk/english</a>                                         |
| Sweden             | Swedish Authority for Privacy Protection (IMY)     | <a href="https://www.imy.se/en/">https://www.imy.se/en/</a>                                                                   |
| Norway             | Norwegian Data Protection Authority (Datatilsynet) | <a href="https://www.datatilsynet.no/en/">https://www.datatilsynet.no/en/</a>                                                 |
| Finland            | Office of the Data Protection Ombudsman            | <a href="https://tietosuoja.fi/en/home/">https://tietosuoja.fi/en/home/</a>                                                   |
| Estonia            | Estonian Data Protection Inspectorate              | <a href="https://www.aki.ee/en">https://www.aki.ee/en</a>                                                                     |
| United Kingdom     | Information Commissioner's Office (ICO)            | <a href="https://ico.org.uk/global/contact-us/">https://ico.org.uk/global/contact-us/</a>                                     |
| Ireland            | Data Protection Commission (DPC)                   | <a href="https://www.dataprotection.ie/en/contact/how-contact-us">https://www.dataprotection.ie/en/contact/how-contact-us</a> |
| Germany            | Federal Commissioner for Data Protection (BfDI)    | <a href="https://www.bfdi.bund.de">https://www.bfdi.bund.de</a>                                                               |
| Spain              | Agencia Española de Protección de Datos (AEPD)     | <a href="https://www.aepd.es">https://www.aepd.es</a>                                                                         |
| Iberia (Corporate) | Iberia Líneas Aéreas de España, S.A.               | <a href="https://www.aepd.es">https://www.aepd.es</a>                                                                         |

## Appendix B: Key contacts

| Role                                | Contact Name    | Contact details                                                                                      |
|-------------------------------------|-----------------|------------------------------------------------------------------------------------------------------|
| Group Data Controller Officer (DCO) | Alison Brindley | <a href="mailto:gdpr@danxcarousel.com">gdpr@danxcarousel.com</a><br>alison.brindley@danxcarousel.com |
| Group Chief Privacy Officer (CPO)   | Resolva Law     | <a href="mailto:gdpr@danxcarousel.com">gdpr@danxcarousel.com</a>                                     |