

BACKGROUND:

<<Insert business name>> privacy is important to you and that you care about how your [our] OR [my] privacy of all of [our] OR [my] [Privacy] only collect and use personal data in a transparent manner, as set out in [our] OR [my] [Privacy Notice], available from <<insert location(s)>>.

As a 'data subject' you have the right to know the law with respect to [our] OR [my] use of your personal data and how to exercise those rights and how to exercise them.

1. Information About [Us] OR [Me]

<<insert business name>>

<<insert business type, [registered in England under] OR [partnership, sole trader etc.]>> [insert company number>>].

[Registered address: <<insert address>>].

[Main trading address: <<insert address>>].

[VAT number: <<insert VAT number>>].

[Data Protection Officer: <<insert name>>].

Email address: <<insert email address>>].

Telephone number: <<insert telephone number>>].

Postal address: <<insert postal address>>].

[Representative: <<insert name>>].

Email address: <<insert email address>>].

Telephone number: <<insert telephone number>>].

Postal address: <<insert postal address>>].

[[We are] OR [I am] regulated by [insert name of regulator(s)>>].]

[[We are] OR [I am] a member of [insert name of association(s) etc.>>].]

[<<insert further information>>].]

2. What Does This Policy Cover?

Under data protection law [insert name of legislation such as the UK GDPR and Data Protection Act 2018] and Data Protection Act 2018 (collectively, "the Data Protection Legislation") individuals have certain rights designed to protect them and their personal data.

This Policy sets out those rights in clear terms, and provides guidelines on how to exercise those rights.

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Legislation as 'any information directly or indirectly identified in

about you that enables you to be
n such as your name and contact
n such as identification numbers,
. The personal data that [we] OR
R [Privacy Notice].

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subject' as follows:

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on-making and profiling.

ght in more detail. If you have any
Protection Legislation, or require
R [my] Data Protection Officer at
missioner's Office[,], or your local

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**R [my] collection and use of your
vide must include details of the
how long [we] OR [I] keep it, and**

our] OR [my] [Privacy Policy] OR
rights is also provided here, in this

Privacy information will be provided at the time of how you will provide the information. We will provide the Privacy Policy and indicate that you have read and understood it.">>

erty, this privacy information will be sent no later than one month after

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the right to obtain a copy of any

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nd why **[we] OR [I]** use your data,
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access request'. A subject access though the more detail you can to respond quickly, there is no access Request Form is available a request.] [You can also find out] **OR** [me] by <<insert system or website and selecting 'access my

subject access request within one request proof of identification or a receipt of that). We may also need to scope and nature of your request, will be paused until you provide the such as where your request is period may be extended by up to all times.

...t access request. For 'manifestly
e] **OR** [I am] permitted to charge a

the right to have inaccurate personal
data deleted.

d to take all reasonable steps to
urate and, where necessary, kept
o this obligation.

me] and asking for your data to be
te, or incomplete. Requests for
an also update your personal data
od, e.g. "logging into your account
>]

A request for your personal data to be deleted. In certain limited cases, for example where you have made multiple requests, this may not be possible. However, you will be kept informed at all times.

your personal data rectified. For
ever, [we are] **OR** [I am] permitted
[my] costs. Alternatively, in some
d to refuse your request.

n' and gives you the right to have
d of' if, for example, it is kept in

n' and gives you the right to have
d of' if, for example, it is kept in

You can exercise this right to have your personal data erased. Requests for erasure of your personal data held by us will be processed as soon as possible and deleted from our systems and removed from your account on our website.

[We are] **OR** [I am] required to delete your personal data as soon as possible. In certain limited cases, for example, where your request is complex or multiple requests, this period may be extended by up to two months. We will be kept informed at all times.

There is not normally a charge for erasure of your personal data. However, [we are] **OR** [I am] permitted to charge a 'reasonable fee' for erasure in some limited circumstances, [we are] **OR** [I am] permitted to refuse your request.

Please note that the right to erasure is not an absolute right and there are certain circumstances set out in the law in which the right does not apply. For example, [we are] **OR** [I am] need it to comply with a legal obligation. If any of these circumstances apply, [we are] **OR** [I am] will explain why your request for erasure cannot be made when responding to your request.

9. The Right to Restrict Processing

You have the right to request restriction of processing of your personal data. In practice, this is an alternative to erasure. You can limit the way in which we process your personal data, while still allowing us to retain it.

Please note that the right to restrict processing is not an absolute right and only applies in certain circumstances:

- a) You have objected to processing of your personal data and [we are] **OR** [I am] have not yet decided whether or not to process your personal data;
- b) Your personal data has been processed unlawfully and you want [us] **OR** [me] to restrict processing of your personal data;
- c) [We are] **OR** [I am] have processed your personal data any more, but you need [us] **OR** [me] to restrict processing of your personal data to establish, exercise, or defend a legal claim; or
- d) You have objected to processing of your personal data and [we are] **OR** [I am] have not yet decided whether or not to process your personal data; or

When processing is restricted, we will not do anything with your personal data other than store it unless one of the following applies:

- a) [We are] **OR** [I am] have processed your personal data in the establishment, in order to protect the rights of another person;
- b) [We are] **OR** [I am] have processed your personal data in order to protect the rights of another person;
- c) Important public interest in the processing of your personal data.

You can exercise this right to restrict processing of your data to be restricted by contacting us at [email address] and asking for the processing of your personal data to be restricted.

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request to restrict the processing of receipt. In certain limited cases, we have made multiple requests, this is not the case. However, you will be kept informed at all times.

al data either with your consent or
and [we are] **OR** [I am] using
aper files), you have the right to
r-used format for use with another
] send your personal data directly

data that you have provided to [us] to insert location, e.g. "profile" or may obtain from your activities on page history and other factors such as statistics from IoT devices such as include additional data that [we] **OR** provided or to data that has been relating to you may be available

your request within one calendar
ole, where your request is complex
may be extended by up to two
nes.

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11. The Right to Object

Where [we are] **OR** [I am] **OR** [my] 'legitimate interests' [we] **OR** [me],] or in the performance of a contract with you, you have the right to object to [us] **OR** [me]

You also have the absolute right to object to [us] **OR** [me] using your personal data for direct marketing purposes.

If you object to [us] **OR** [me] using your personal data for direct marketing purposes, we have no grounds on which to refuse.

If you object to [us] **OR** [me] using your personal data either on the basis of [our] **OR** [my] 'legitimate interests' [we] **OR** [me],] or in the performance of a contract with you, please note that your request to exercise this right, you must give specific reasons. We will consider your request and, if [we] **OR** [I] can demonstrate that our legitimate interests, rights, and freedoms; or the interests, rights, and freedoms of others; or the prevention, exercise, or defence of legal claims. Additional limitations may apply if your personal data is being processed for research purposes.

You can exercise this right by contacting [us] **OR** [me] and stating your objection to the processing of your personal data for the purpose or purposes, providing an explanation if required. Your objection can be made orally or in writing. If you object to [us] **OR** [me] processing your personal data [for direct marketing purposes, e.g. "logging into your account" or "my personal data."] or "I want to change my marketing preferences."

[We are] **OR** [I am] require your request within one calendar month of receipt. In certain circumstances, where your request is complex or you have made multiple requests, the time may be extended by up to two months; however, you will be kept informed of the progress.

There is not normally a fee for exercising your right to object. For 'manifestly unfounded or excessive' requests, [we] **OR** [I am] permitted to charge a 'reasonable fee' that covers the costs of processing your request. Alternatively, in some limited circumstances, [we] **OR** [I am] may refuse your request.

12. Automated Decision-Making

[We] **OR** [I] do not carry out automated decision-making (i.e. making a decision using automated means of processing your personal data) **OR** [We] **OR** [I] carry out automated decision-making (i.e. making a decision using automated means of processing your personal data, as described in our Privacy Policy) **OR** [Privacy Notice].]

You have the right not to be subject to automated decision-making based solely on automated processing, including profiling, which produces legal or 'similarly significant' effects.

You have the right to challenge an automated decision in the following way and can:

- Request human review of the decision
- Express your views and provide additional information

- c) Obtain an explanation of the decision and challenge it. **OR [me]** about the decision and

You can exercise this right by asking [me] and stating that you wish to ask about or challenge the decision by solely using your personal data by solely automated means, telling [me] above (a, b, and/or c) you wish to do (see previous paragraph) **OR [me]** orally or in writing.

[We are] OR [I am] require that you complete your request within one calendar month of receipt of your request to exercise your rights. In exceptional cases, for example, where your request is complex or you have multiple requests, this period may be extended to a maximum of two months; however, this period must not be extended at all times.

There is not normally a fee for the exercise of your rights relating to automated decision-making (including profiling), however, [we are] may refuse to charge a 'reasonable fee' that covers [our] **OR [my]** costs in limited circumstances, [we] **OR [I]** may be permitted to refuse to provide the information if the request is manifestly unfounded or excessive.

13. Exercising Your Rights

To exercise any of your rights, please contact **[[our] OR [my] Data Protection Officer ("DPO")]** (insert job role>>) **OR [me]** via:

- Email: <<insert email address>>
- Post: <<insert address>>
- [Online Form: <<insert link>>]
- Telephone: <<insert number>>

When contacting **[us] OR [me]** to exercise your right of access, please **[use the contact details above (a, b, and/or c)]** or **[provide the contact details below (a, b, and/or c)]** provide:

- Your full name;
- Your address;
- Your telephone number;
- Your email address;
- Details of the information you are requesting.

When contacting **[us] OR [me]** to exercise your right to rectification, please provide:

- Your full name;
- Your address;
- Your telephone number;
- Your email address;
- Details of the information you are requesting to be rectified; and
- (Where relevant) any evidence that supports your request or otherwise demonstrates the inaccuracy of the information.

When contacting **[us] OR [me]** to exercise your right of erasure, please provide:

- Your full name;
- Your address;

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- Your telephone number;
- Your email address;
- Details of the information requested; and
- (Where relevant) any evidence that supports your request or otherwise justifies the need to access the information.

When contacting [us] **OR** where you wish to exercise your rights to restrict processing or to object to processing, please provide:

- Your full name;
- Your address;
- Your telephone number;
- Your email address;
- Details of the processing you wish to restrict or object to;
- Details of why you wish to restrict or object to it; and
- (Where relevant) any evidence that supports your request or otherwise justifies the need to be restricted or stopped.

When contacting [us] **OR** where you wish to exercise your right to data portability, please provide:

- Your full name;
- Your address;
- Your telephone number;
- Your email address;
- Details of the personal data you wish to use with another service or organisation, also stating whether you wish to receive a copy of that data for yourself or whether you wish to transfer it directly to the other service or organisation;
- (Where relevant) any evidence that supports your request.

When [us] **OR** [me] to exercise your right to object to automated decision-making (including profiling), please provide:

- Your full name;
- Your address;
- Your telephone number;
- Your email address;
- Details of the decision you wish to object to, stating whether you wish to request human intervention in the decision, or wish to object to the decision; and
- (Where relevant) any evidence that supports your request.

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14. **[Our] OR [My] Acknowledgement**

[We] **OR** [I] will always respond to your request in relation to your personal data as quickly as possible, without undue delay and will provide a clear explanation of our actions. Normally, as stated above, we will respond to your request. If additional time is required, we will contact you within the first calendar month to explain why.

request to exercise any of your rights under this Policy, we will acknowledge receipt without undue delay and will respond to your request as quickly as possible. Normally, as stated above, we will respond to your request. If additional time is required, we will contact you within the first calendar month to explain why.

15. **Your Right to Complain**

If you have any cause for concern about [our] **OR** [my] handling of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

[We] **OR** [I] would welcome you to raise your concerns [ourselves] **OR** [myself], however, so please do so first using the details set out above in Part 12.

16. **Changes to this Policy**

[We] **OR** [I] may change this Policy from time to time. This may be necessary, for example, if the law changes or if we [our] **OR** [my] business in a way that affects personal data processing. We will also be reviewed [regularly] **OR** [on a <<insert interval>> basis].

Any changes will be made available on our website [where/how>>]. This Policy was last reviewed on <<insert date>>.