

## [ICAP PEOPLE SOLUTIONS] SUBJECT ACCESS REQUEST PROCEDURES

### 1 INTRODUCTION

This procedure document supplements the subject access request (SAR) provisions set out in **[ICAP People Solutions]** (hereinafter referred to as the **'ICAP PEOPLE SOLUTIONS' or 'ICAP'**) Data Protection Policy & Procedure and provides the process for individuals to use when making an access request, along with the protocols followed by the Company when such a request is received.

The Company collects personal information to effectively and compliantly carry out our everyday business functions and services and, in some circumstances, to comply with the requirements of the law and/or regulations.

As the Company processes personal information regarding individuals (data subjects), we are obligated under the General Data Protection Regulation (GDPR) to protect such information, and to obtain, use, process, store and destroy it, only in compliance with the GDPR and its principles.

#### THE GENERAL DATA PROTECTION REGULATION

The General Data Protection Regulation (GDPR) gives individuals the right to know what information is held about them, to access this information and to exercise other rights, including the rectification of inaccurate data. The GDPR is a standardised regulatory framework which ensures that personal information is obtained, handled and disposed of properly.

As the Company are obligated under the GDPR and Hellenic data protection laws, we abide by the Regulations' principles, **which ensure that personal information shall be:** -

- processed lawfully, fairly and in a transparent manner in relation to the data subject (**'lawfulness, fairness and transparency'**)
- collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes (**'purpose limitation'**)
- adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed (**'data minimisation'**)
- accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay (**'accuracy'**)
- kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed (**'storage limitation'**)
- processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures (**'integrity and confidentiality'**).

The Regulation also requires that 'the controller shall be responsible for, and be able to demonstrate, compliance with the GDPR principles' (**'accountability'**). The Company have adequate and effective measures, controls and procedures in place, that protect and secure your personal information and guarantee that it is only ever obtained, processed and disclosed in accordance with the relevant data protection laws and regulations.

## 2 WHAT IS PERSONAL INFORMATION?

**Information protected under the GDPR is known as “personal data” and is defined as: -**

“Any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.”

Further information on what constitutes personal information and your rights under the data protection regulation and laws can be found on the Hellenic Data Protection Authority [www.dpa.gr](http://www.dpa.gr)

## 3 THE RIGHT OF ACCESS

Under Article 15 of the GDPR, an individual has the right to obtain from the controller, confirmation as to whether or not personal data concerning them is being processed. We are committed to upholding the rights of individuals and have dedicated processes in place for providing access to personal information.

**Where requested, we will provide the following information:**

- the purposes of the processing
- the categories of personal data concerned
- the recipient(s) or categories of recipient(s) to whom the personal data have been or will be disclosed
- If the data has been transferred to a third country or international organisation(s) (and if applicable, the appropriate safeguards used)
- the envisaged period for which the personal data will be stored (or the criteria used to determine that period)
- existence of automated decision-making, including profiling and meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject
- where the personal data was not collected directly from the individual, any available information as to its source

### 3.1 HOW TO MAKE A SUBJECT ACCESS REQUEST (SAR)?

A subject access request (SAR) is a request for access to the personal information that the Company holds about you, which we are required to provide under the GDPR (unless an exemption applies). The information that we provide is covered in section 3 of this document.

You can make this request in writing using the details provided in section 7, or you can submit your access request electronically. Where a request is received by electronic means, we will provide the requested information in a commonly used electronic form (unless otherwise requested by the data subject).

### 3.2 WHAT WE DO WHEN WE RECEIVE AN ACCESS REQUEST

#### Identity Verification

Subject Access Requests (SAR) are passed to the **[Data Protection Officer/Compliance Officer]** as soon as received and a record of the request is noted. The person in charge will use all reasonable measures to verify the identity of the individual making the access request, especially where the request is made using

online services.

We will utilise the request information to ensure that we can verify your identity and where we are unable to do so, we may contact you for further information, or ask you to provide evidence of your identity prior to actioning any request. This is to protect your information and rights.

If a third party, relative or representative is requesting the information on your behalf, we will verify their authority to act for you and again, may contact you to confirm their identity and gain your authorisation prior to actioning the any request.

### **Information Gathering**

If you have provided enough information in your SAR to collate the personal information held about you, we will gather all forms (hard-copy, electronic etc) and ensure that the information required is provided in an acceptable format. If we do not have enough information to locate your records, we may contact you for further details. This will be done as soon as possible and within the timeframes set out below.

### **Information Provision**

Once we have collated all the personal information held about you, we will send this to you in writing (or in a commonly used electronic form if requested). The information will be in a concise, transparent, intelligible and easily accessible format, using clear and plain language.

## **4 FEES AND TIMEFRAMES**

SARs are always completed within 30-days and are provided free of charge. Where the request is made by electronic means, we provide the information in a commonly used electronic format, unless an alternative format is requested.

The Company always aim to provide the requested information at the earliest convenience, but at a maximum, 30 days from the date the request is received. However, where the retrieval or provision of information is particularly complex or is subject to a valid delay, the period may be extended by one month. If this is the case, we will write to you within 30 days and keep you informed of the delay and provide the reasons.

## **5 YOUR OTHER RIGHTS**

Under the GDPR, you have the right to request rectification of any inaccurate data held by us. Where we are notified of inaccurate data, and agree that the data is incorrect, we will amend the details immediately as directed by you and make a note on the system (or record) of the change and reasons.

We will rectify the errors **within 30-days** and inform you in writing of the correction and where applicable, provide the details of any third-party to whom the data has been disclosed.

If for any reason, we are unable to act in response to a request for rectification and/or data completion, we will always provide a written explanation to you and inform you of your right to complain to the Supervisory Authority and to seek a judicial remedy.

In certain circumstances, you may also have the right to request from the Company, the erasure of personal data or to restrict the processing of personal data where it concerns your personal information; as well as the right to object to such processing. You can use the contact details in section 7 to make such requests.

## 6 EXEMPTIONS AND REFUSALS

The GDPR contains certain exemptions from the provision of personal information. If one or more of these exemptions applies to your subject access request or where the Company does not act upon the request, we shall inform you at the earliest convenience, or at the latest, within one month of receipt of the request.

Where possible, we will provide you with the reasons for not acting and any possibility of lodging a complaint with the Supervisory Authority and your right to seek a judicial remedy. Details of how to contact the Supervisory Authority are laid out in section 7 of this document.

## 7 SUBMISSION & LODGING A COMPLAINT

To submit your SAR, you can contact us at [[ps-privacy@icap.gr](mailto:ps-privacy@icap.gr)] or visit our Subject Access Request page on our website <https://icappeoplesolutions.com/en/uploads/ps-sar-en-v-1-8.pdf> [8 APPENDIX-1].

You can also submit your request or complaint in writing using the form in Appendix-1, sending the request to: Complaints Department, [ps-privacy@icap.gr](mailto:ps-privacy@icap.gr)  
ICAP People Solutions S.A. , 2 El. Venizelou, 17676, Greece, +302107200156

If you are unsatisfied with our actions or wish to place a further data subject request, you can contact us in writing at: DPO/Privacy Office, [ps-privacy@icap.gr](mailto:ps-privacy@icap.gr)  
ICAP People Solutions S.A. , 2 El. Venizelou, 17676, Greece, +302107200419

### Supervisory Authority

If you remain dissatisfied with our actions, you have the right to lodge a complaint with the Supervisory Authority. The Supervisory Authority can be contacted at:

Hellenic Data Protection Authority, 1-3 Kifisias Avenue, 11523, Athens, +302106475628,  
[complaints@dpa.gr](mailto:complaints@dpa.gr)

**8 APPENDIX-1**

**Subject Access Request Form**

Under the General Data Protection Regulation, you are entitled as a data subject to obtain from the Company, confirmation as to whether or not we are processing personal data concerning you, as well as to request details about the purposes, categories and disclosures of such data.

You can use this form to request information about, and access to any personal data we hold about you. Details on where to return the completed form can be found at the end of this document.

**1. Personal Details:**

<b>Data Subject's Name:</b>		<b>DoB:</b>	__ / __ / ____
<b>Home Telephone No:</b>		<b>Email:</b>	

**Data Subject's Address:**

**Any other information that may help us to locate your personal data:**

**2. Specific Details of the Information Requested:**

**3. Representatives** (only complete if you are acting as the representative for a data subject)

[Please Note: We may still need to contact the Data Subject where proof of authorisation or identity are required]

<b>Representative's Name:</b>		<b>Relationship to Data Subject:</b>	
<b>Telephone No:</b>		<b>Email:</b>	

**Representative's Address:**

**I confirm that I am the authorised representative of the named data subject:**

**Representative's Name:** \_\_\_\_\_ **Signature:** \_\_\_\_\_

**4. Confirmation**

**Data Subject's Name:** \_\_\_\_\_ [print name]

**Signature:** \_\_\_\_\_ **Date:** \_\_\_\_ / \_\_\_\_ / \_\_\_\_

**5. Completed Forms**

**For postal requests, please return this form to:**

- DPO/Privacy Office, ICAP People Solutions S.A., 2 El. Venizelou, 17676, Greece, or
- Customer Care / Complaints Department, ICAP People Solutions S.A. , 2 El. Venizelou, 17676, Greece

**For email requests, please return this form to:** [ps-privacy@icap.gr](mailto:ps-privacy@icap.gr)