IINAVISITE

Data Subject Access Requests (DSARs)

This document describes our procedure for handling Data Subject Access Requests under GDPR.

1. Scope and Purpose

This procedure sets out the key features regarding handling or responding to requests for access to personal data made by data subjects, their representatives or other interested parties. This procedure enables us, Navisite (the "Company"), to comply with EU General Data Protection Regulation ("GDPR") obligations and enable individuals to verify that information held about them is accurate.

This procedure applies to Company employees that handle data subject access requests, such as the Company's Data Privacy Group (Privacy@Navisite.com).

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 Information Commissioners Office (ICO) website located at: https://ico.org.uk/for-the-public/.

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.
- If the data has been transferred to a third country or international organization(s) (and, if applicable, the appropriate safeguards used).
- The period for which the personal data will be stored (or the criteria used to determine that period).
- Where the personal data was not collected directly from the individual, any available information as to its source.

4. Data Subject Access Requests

A Data Subject Access Request ("DSAR") is any request made by an individual or an individual's legal representative for information held by the Company about that individual. DSAR provides the right for data subjects to see or view their own personal data as well as to request copies of the data.

A DSAR must be made in writing. In general, verbal requests for information held about an individual are not valid DSARs. In the event a formal DSAR is made verbally to a staff member of the Company, further guidance should be sought from Navisite's office of Data Privacy (Privacy@Navisite.com), who will consider and approve all DSARs.

5. What We Do When We Receive a Request

5.a. Verification

DSARs are passed to the Privacy Group 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 utilize 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 authorization prior to actioning any request.

5.b. Information Gathering

If you have provided enough information in your DSAR 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.

5.c. Information Provision

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

6. Your 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.

We will rectify the errors within thirty (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.

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.

7. Exceptions

An individual does not have the right to access information recorded about someone else, unless they are an authorized representative or have parental responsibility.

The Company is not required to respond to requests for information unless it is provided with sufficient details to enable the location of the information to be identified and to satisfy itself as to the identity of the data subject making the request.

In principle, the Company will not normally disclose the following types of information in response to a DSAR:

- Information about other people
- Information about customers
- Publicly available information
- Opinions given in confidence or protected by copyright law
- Privileged documents

8. Submission

To submit your DSAR, please contact us at: Privacy@Navisite.com.

The Privacy Office
Navisite
400 Minuteman Road
Andover, MA 01810