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# DATA SUBJECT ACCESS REQUEST POLICY

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# Data Subject Access Request Policy

## 1. About this policy

Bravura Solutions (“BSL”) is committed to complying with laws and regulations in the jurisdictions it operates in and is committed to responding to all data subject access requests (“DSAR”) in an open and honest way, and in ensuring all personal data is processed fairly and lawfully in accordance with data subjects’ rights.

The General Data Protection Regulation (“GDPR”) came into force in May 2018, and gives individuals (“Data Subject”) who are residents of the EU (European Union) and the UK, the right of access, commonly referred to as subject access, to their personal data. This policy explains the rights of the data subject in relation to a DSAR and BSL’s responsibilities when dealing with that request.

BSL applies this policy to all jurisdictions in which BSL operates, in accordance with legislation in those jurisdictions.

## 2. Individual Rights

As a Data Subject you have the right to know what personal data is held about you, and to receive a copy of that data from us if we hold any personal data, as well as details of:

- the purposes for which we process your personal data including the lawful basis.
- the recipients or categories of recipient to whom your personal data have been or will be disclosed, including recipients in third countries or international organisations.
- where you did not give us the personal data, the source from which we collected your personal data.
- whether we use any automated decision making in relation to the processing of your personal data; and
- the retention periods for your personal data.

GDPR applies to the processing of personal data, and not to business data. Personal data may include identifiers such as name, identification number, location data, an online identifier etc. The most common reasons that we may hold personal data about you is if you:

- are or have been an employee or contractor of BSL; or
- have had a service delivered to you via a contract we hold or held with a business partner.

If we hold your personal data you are entitled to have that personal data rectified if inaccurate, to have it deleted, to object to its use, to request restriction of processing or to have your data transferred.

Whilst you have the right to know what information is held about you at the time of your request you are not usually entitled to receive any data relating to other people (unless the information is also about them, or you are acting on behalf of someone else). You should be aware that in accordance with our Records Retention Policy we routinely destroy information and we’re unable to recreate or provide information which was previously held but has since been routinely destroyed.

## 3. How to make a subject access request?

You may make a DSAR either verbally or in writing by contacting us as follows:

- by writing: The Human Resources Manager, Bravura Solutions Limited, Dashwood House, 10<sup>th</sup> Floor, 69 Old Broad Street, London, EC2M 1QS.
- by email: Chief Information Security Officer (CISO) [dataprotection@bravurasolutions.com](mailto:dataprotection@bravurasolutions.com)
- by telephone: +44 207 997 3000 and ask to speak to the Human Resources Manager or Chief Information Security Officer.
- Other Bravura Office details: [Contact us - Bravura Solutions](#)

We prefer if you make a request in writing to enable us to identify all the data you require, especially where the request involves larger volumes or complex data. We recommend you use the template below (“Letter Template: Data Subject Access Request”) when making a written request. We may contact you if we are not clear about what is being requested if you make a request verbally or in writing.

Our Chief Information Security Officer (CISO) monitors compliance with this policy and can provide advice on responding to DSARs. Should you not be satisfied with how we have stored or processed your personal data, you have a right to lodge a complaint with us by contacting our Human Resources Manager or Chief Information Security Officer (CISO).

## 4. What do we do when we receive a subject access request?

### Identity Verification

When we receive a DSAR we will first check that we have enough information to be sure of the Data Subject’s identity. Often, we will have no reason to doubt a person’s identity, for example, if we have regularly corresponded with them. However, if we have reasonable cause to doubt a person’s identity, we can ask for any evidence we reasonably need to confirm the identity. We will not usually progress a DSAR until we have confirmed the identity.

The period for responding to the DSAR (i.e., the one calendar month) only begins when we have verified the identity of the requestor. However, we may elect to waive the requirement for the applicant to provide proof of identity if we are reasonably satisfied that we know your identity.

If you are a relative/representative of the individual concerned, we would require evidence of the Data Subject’s consent for the release of their personal data. We would also require confirmation of your capacity to act on their behalf and explanation of how you’re entitled to access their information.

Information we may request from you includes:

- 2 recent utility bills of not less than 3 months old (originals only); together with
- a certified copy of your passport, or certified copy of a similar government issued identity document; and or
- proof of consent to act for the Data Subject, if applicable.

### Clarifying the request

Where we have a large amount of information relating to the applicant, we may correspond with you to clarify what specific information you are looking for.

You are entitled to request copies of emails held by BSL containing personal data relating to you. However, BSL’s email systems are not capable of identifying and extracting all personal data relating to a specific Data Subject only. Kindly note that the results of email searches usually result in large volumes of complex data, containing personal data information about more than one person. Depending upon the volume involved, requesting email data may therefore result in an extended timescale for responding to an DSAR. BSL processes and holds data for a large number of employees and its business partners. It is not feasible to conduct a search of every email account for a single name and very broad requests e.g., “all emails relating to me”, are more likely to be considered manifestly unfounded and excessive under GDPR. Therefore, to enable us to identify emails containing personal data relating to you, we will need you to provide the following information with your request:

- names of the sender/recipients of the emails
- dates (or date ranges) of the emails, e.g., from 25 May 2018 to 31 July 2019
- any other relevant information that might assist BSL to locate specific information you require.

### Collating the information

This is not a limited set of circumstances, and we will conduct a reasonable and proportionate search all our systems and records to check for information for all information for all subject access requests. We will gather any manual or electronically held information (including emails) and identify any information provided by a third party or which identifies a third party.

We will write to that third party asking whether there is any reason why this information should not be disclosed. We do not have to supply the information to you unless the other party has provided their consent, or it is reasonable to do so without their consent. If the third-party objects to the information being disclosed, we may seek legal advice on what action we should take.

Before sharing any information that relates to third parties, we will where possible anonymise information that identifies third parties not already known to the Data Subject and edit information that might affect another party's privacy unless we have consent from the third party to provide it. The Data Subject access right is about information (i.e., personal data) and not about documentation. Accordingly, we may extract the applicant's personal data from documentation or redact information which is not the applicant's personal data when preparing our response. Where appropriate we may provide relevant contextual information to assist the applicant. BSL does not perform automated decision making or profiling.

## Issuing our response

We aim to comply with a request without undue delay and within one calendar month of receipt of the request or (if later) within one month of receipt of:

- any requested information to clarify the request; or
- any information requested to confirm the requestor's identity; or
- a fee.

Copies of the information will be sent to you electronically wherever possible, or if this is not technically possible, by post which may be collected in person; or sent by post (recorded delivery). We will only share your information with a third party if you have written to us and given your consent for us to provide it to someone else.

In rare circumstances where we cannot meet that deadline, if the request is complex or we have received a number of requests from the individual, we will contact you within that calendar month to tell you the reasons why and give you a realistic date of when we will provide the information. This should be no longer than 3 months from the original date of a valid DSAR.

BSL is committed to meeting all reasonable requests in accordance with GDPR, whilst protecting BSL intellectual property and respecting the ethos of honest, confidential feedback which forms part of BSL reputation. If we hold no information about you, we will let you know, and if any exemptions or refusals apply.

## 5. Will we charge a fee?

We won't charge a fee for most DSARs. However, we retain the right to charge a "reasonable fee" for the administrative costs of complying with the DSAR if:

- it is manifestly unfounded or excessive; or
- an individual requests further copies of their data following a request.

We may also refuse to comply with a manifestly unfounded or excessive request. In both instances if this applies to the DSAR we will contact you within one month of receiving your request to let you know.

## 6. What if you identify an error in our records, or want us to stop processing your data?

If you want us to correct errors or restrict processing your data or erase your data or object to the processing of your data, tell us in the same way as detailed in section 4 above. We have one calendar month to respond to you and will follow a similar process for confirmation of your identity, investigation, review and communicating with you as described in this policy for managing DSARs.

If we agree that the information is inaccurate, we will correct it and where practicable, destroy the inaccurate information. We will consider informing any relevant third party of the correction. If we do not agree or feel unable to decide whether

the information is inaccurate, we will make a note of the alleged error and keep this on file. We will provide you with written notice that either we have complied with your request, intend to comply with it or state the extent to which we will comply with it and why. Further information can be found at <https://ico.org.uk/>

## 7. Your right to complain to Bravura Solutions and the Supervisory Authority (e.g., the ICO of the UK)

Complaints about responses should be referred to our Human Resources Manager or Head of Information Security. Your complaint will be investigated, and you will receive a response to your complaint within one calendar month of receipt of your complaint. If you remain dissatisfied with the outcome of your complaint you have the right to make a further complaint to the Supervisory Authority (e.g., the ICO of the UK) or to start legal action to enforce your subject access rights. See the ICO website for more information: <https://ico.org.uk> or write to Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, or call the ICO at 0303 123 1113.

## 8. Policy review

If we decide to change this policy, we will add a new version to our website.

## LETTER TEMPLATE – DATA SUBJECT ACCESS REQUEST

[Your full address]  
[Phone number]  
[The date]

The Human Resources Manager  
Bravura Solutions  
Dashwood House  
10<sup>th</sup> Floor  
69 Old Broad Street  
London  
EC2M 1QS

Dear Bravura Solutions,

### DATA SUBJECT ACCESS REQUEST

(Use this form for a request to correct, restrict, erase or object)

Please supply me with personal data about me that you hold, process or transfer for which I am entitled to receive a copy thereof under data protection law (e.g., The GDPR, Australian Privacy Act, NZ Privacy Act, POPIA, etc). I have explained what personal data or other actions I require in this form:

#### Personal Details

|  |  |
|--|--|
| Data Subject's Name and DOB                                      |  |
| Address likely to have been recorded by Bravura Solutions        |  |
| Telephone  |  |
| Email  |  |
| Any other information that may help us locate your personal data |  |

#### Specific Details of the Information Requested

|  |  |
|--|--|
| What personal data, when and with whom |  |
|--|--|

## Representatives

(Only complete if you are acting as the representative for a Data Subject. 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>                        |  |
| <b>Address</b>  |  |                                     |  |
| <p>I confirm that I am the authorised representative of the named Data Subject</p> <p><b>Representatives' Signature:</b> _____</p> <p><b>Date signed:</b> _____</p> |  |                                     |  |

## Right to data portability, right to be forgotten, right to data restriction.

Please complete this section if you wish to invoke the following rights as a Data Subject:

| Rights as a Data Subject                                | I require the following (please tick) | Reason  |
|---|---------------------------------------|---|
| Right to be forgotten – please delete my personal data. |                                       | Please explain why you require your personal data to be deleted.      |
| Right to have errors corrected                          |                                       | Please list what errors require to be corrected:                      |
| Right to restrict processing my personal data           |                                       | Please explain why you require restriction or stopping of processing: |



| Rights as a Data Subject  | I require the following (please tick) | Reason   |
|---|---------------------------------------|--|
| <p><b>Please transfer my personal data to a third party</b></p> |                                       | <p>Please explain why and to whom Bravura Solutions should transfer your personal data. We may contact you for additional information and require confirmation from the third party.</p> |

If you need any more data from me, or a fee, please let me know as soon as possible. It may be helpful for you to know that data protection law (the GDPR) requires you to respond to a request for data within one calendar month.

If you do not normally deal with these requests, please pass this letter to your Human Resources Manager or Chief Information Security Officer (CISO). If you need advice on dealing with this request, the relevant Supervisory Authority e.g., the UK's Information Commissioner's Office can assist you. Its website is <https://ico.org.uk/> or it can be contacted on 0303 123 1113. Regulator's details can be found at:

- UK: Information Commissioner's Office <https://ico.org.uk/>
- Poland: Personal Data Protection Office - <https://uodo.gov.pl/en>
- Australia: Office of the Australian Information Commissioner - <https://www.oaic.gov.au/>
- New Zealand: Privacy Commissioner - <https://www.privacy.org.nz/>
- India: The Ministry of Electronics & information Technology - <https://meity.gov.in/>
- South Africa: Information Regulator - <https://www.justice.gov.za/inforeg>
- Hong Kong: Privacy Commissioner for Personal Data - <https://www.pcpd.org.hk/index.html>
- Bermuda: Privacy Commissioner - [PrivComBermuda](#) | Office of the Privacy Commissioner for Bermuda
- Luxembourg: [National Commission for Data Protection](#) - National Data Protection Commission - Luxembourg (public.lu)

**Yours faithfully**

[Full Name]:

[Signature]:

**For emailed requests, please return this form to:** [dataprotection@bravurasolutions.com](mailto:dataprotection@bravurasolutions.com)