

## Subject Access Request Policy

### Purpose

The General Data Protection Regulation (GDPR) gives data subjects many rights.

1. Right of access (Article 15)
2. Right of rectification (Article 16)
3. Right to be forgotten (Article 17)
4. Right to restrict processing & object (Article 18 & 21)
5. Right to data portability (Article 20)

When an individual makes a request to Velocity Global regarding these rights, this is known as a Subject Access Request (SAR). If we receive a SAR from an individual whose data we process on behalf of another party, we will inform them of such a request and work with both the third party and the individual to complete the request.

### Policy

Velocity Global is transparent with regards to its processing and data handling and willing to accommodate all lawful requests that relate to GDPR based SARs.

### Procedures

#### Filing a SAR

1. We process SAR requests at the request of the controllers for whom we process data.
2. All SAR requests must be in writing. See the SAR form.
3. To confirm your identify, two forms of identification are required.
4. You must comply with any additional information requested to complete the request.

#### Processing a SAR (Article 15)

1. SAR requests are responded to as a confirmation to the requestor.
2. SARs are processed within 30 days.
3. We will confirm your identity in our system.
4. We may request additional information from you in order to service your request.
5. Next, we will process your request. We will identify if any of the information collected from you was provided by or identifies a third party. If we find information that relates to third parties we will take all reasonable steps to establish whether this information can be disclosed. We are not required to disclose information relating to third parties, unless they have 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, when possible, anonymize the information that identifies individuals not already known to you. We will also redact information that may affect another party's privacy, and if necessary summarize the information provided.

6. Then, we will issue our response to your request.

#### Inaccurate information (Article 16)

If you think there is an error in your personal information, please contact us immediately.

1. If we agree that there is an error, we will correct it, remove it, or if you have access to the information recommend that you correct it yourself.
2. If we disagree and do not believe that there is an error, we will not correct the information but we will make a note that there could be a discrepancy.

#### Deleting the information (Article 17)

If you want the information deleted, please contact us, but understand that this only applies in certain situations. We only delete information from the current system and we allow our backups to age out according to our retention policy.

1. If we no longer need the information and there is not a lawful reason to keep the information, we will delete it.
2. If we have a lawful reason to keep the information, we will not delete it upon your request but will delete it according to our retention schedule.

#### Stop processing the information (Article 18 & 21)

The right to prevent processing applies to specific circumstances.

1. If we can comply with your request and it is lawful, we will carry out the request.
2. If we can not comply with the request and it is lawful, we will discuss with you the options.
3. If it is not a lawful request, we will not comply with the request, and inform you of such.

#### Moving information (Article 20)

If you want to reuse your personal information with a different service provider, we use the tools provided by our service providers to complete this request.

1. Depending on the information requested and the service provider holding the information, we will strive to create a CSV file for you.

#### Complaint Process

If you have a complaint with how we have handled a SAR please let us know and we will try to fix it. You can email the Data Protection Officer (DPO), at [Privacy@VelocityGlobal.com](mailto:Privacy@VelocityGlobal.com) or by calling +1 (303) 309-2894.