

POL-504 SUBJECT ACCESS REQUEST POLICY

1 - PURPOSE

This document describes Monek's policy for acting on a Data Subject Access Request (DSAR) regarding personal data held by Monek Limited and their sub-processors. The policy outlines our position to ensure compliance with Monek Limited Policies and Standards regarding IT security and GDPR.

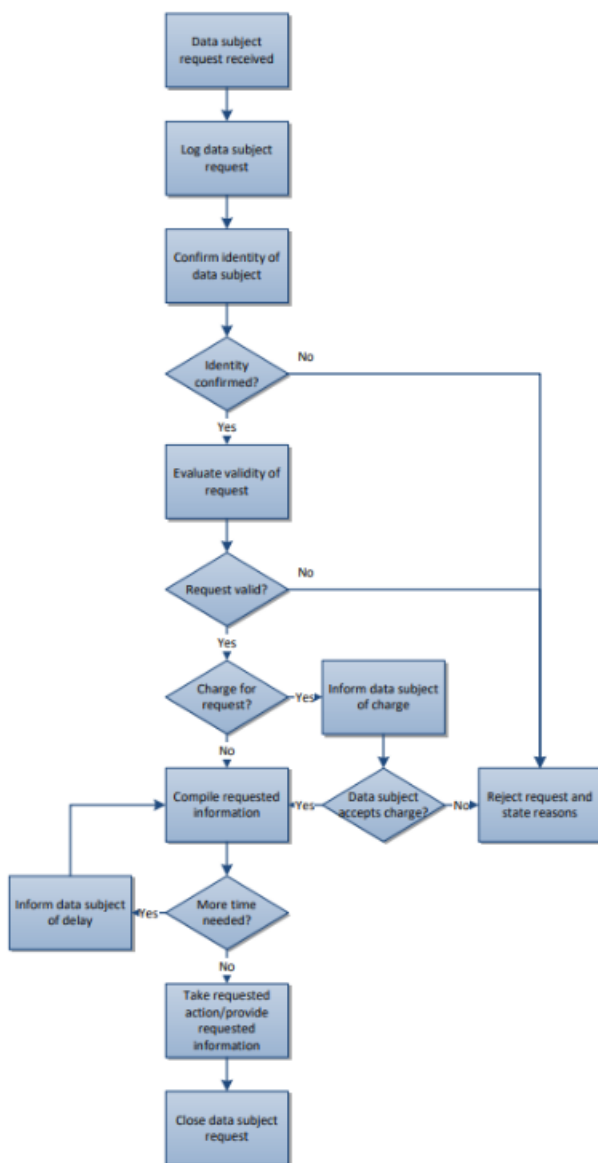
2 - POLICY

This policy applies to any personal data held by Monek Limited and their sub-processors.

- Where we are the data processor, we will only accept DSARs from the data controller i.e a merchant or partner.
- We will action all requests within 30 days of receipt.
- If the request is classed as complex or numerous, we may extend the delivery time frame to 90 days but will notify of this extension within 30 days.
- If the request is classed as manifestly unfounded or excessive or would contradict our legal and financial obligations then we may invoke our right to refuse to comply but again, we will notify of this within 30 days.
- We will accept Data Subject Access Requests in any form including verbally but have created a Data Subject Access Request template to enable us to deal with all requests consistently – if this is not completed by the Data Controller then we will transpose the details onto the form and add it to our Data Subject Access Request Register.
- We will use all reasonable means to identify the identity of the individual prior to accepting any Data Subject Access Request, if additional information is required then we will advise exactly what is required prior to acting on a Data Subject Access Request.
- We will inform any sub-processors that may have to make any changes and request confirmation that their actions have been completed in writing.

- We reserve the right to refuse any right to rectification where we believe the data is correct and will inform the requestor of this within 30 days.

3 - FLOWCHART



4 - ROLES AND RESPONSIBILITIES

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Operations Director Operation of this policy, including maintenance of security controls and documentation. All employee

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