
Data Subject Access Request Procedure

1. Data Subjects are entitled to be informed whether any personal data about them is being processed by OSF.
2. When OSF processes personal data on behalf of a Customer, OSF acts as a Processor, and the Customer will be primarily responsible for meeting the legal requirements as a Controller according to GDPR. If an OSF Entity receives a Data Subject access request, the OSF Entity will manage such request in accordance with the MSA, SOW or DPAA that OSF has concluded with the Controller according to GDPR provisions. This may include transferring the request to the Controller and not responding by OSF to such request.
3. Where a Data Subject access request is subject to EU/EEA data protection law, such a request will be dealt with by OSF in accordance with this Data Subject Access Request Procedure. Such a request is subject to EU/EEA data protection law where the OSF Entity or the Controller is established in the EU/EEA or where the processing activities are related to the offering of Services to individuals in the EU/EEA or to the monitoring of their behavior as far as their behavior takes place within the EU/EEA. Where applicable EU/ EEA data protection law differs from any aspect of this Data Subject Access Request Procedure, the EU/EEA data protection law will prevail.
4. The Data Subject making a valid request to an OSF Entity is entitled to:
 - Obtain the confirmation whether or not the Personal Data concerning the Data Subject are being processed by the OSF Entity and, where that is the case, access such Personal Data
 - Be given a description of the categories of Personal Data concerned and the following information:
 - a. the purposes of the Processing.
 - b. the recipients or categories of recipient to whom the Personal Data is or may be disclosed by the OSF Entity.
 - c. where possible, the envisaged period for which the Personal Data will be stored or, if this is not possible, the criteria used to determine that period.
 - d. the existence of the right to request from the Controller rectification or erasure of Personal Data or restriction of processing or to object to such processing.
 - e. the right to lodge a complaint with a Supervisory Authority and — where Personal Data are not collected from the Data Subject— any available information as to their source.
 - f. the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) of the GDPR and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the Data Subject.

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- g. the appropriate safeguards according to Article 46 of GDPR applied where Personal Data are transferred to a Third Country.
- Receive — free of charge — a copy of the Personal Data undergoing processing; for any further copies requested by the Data Subject, a reasonable fee based on administrative costs may be charged.

5. The Data Subject Access Request must be made in writing, which can include an email to dataprotection@osf.digital . Where the Data Subject makes the request by electronic means, the personal data shall be provided in a commonly used electronic form, unless otherwise requested by the respective Data Subject.

6. The OSF Entity will respond to a valid request without undue delay and in any event within one month of receipt of the request. That period may be extended by two further months where necessary, considering the complexity and number of requests. The Data Subject will be informed of any such extension within one month of receipt of the request, together with the reasons for the delay.

Procedure:

- i. If OSF receives a request from a Data Subject for access to their Personal Data, OSF *will inform the Controller immediately but no later than the day following* that on which the Data Subject Access Request has been received by OSF.
- ii. If the OSF Entity is authorized by the Controller to deal directly with such request or it is required by law to do so, *the OSF Employee* who received the Data Subject Access Request *will inform the Data Protection Officer immediately but no later than the day following* that on which the Data Subject Access Request has been received, indicating the date on which the request was received together with any other information that may assist the Data Protection Officer to deal with the respective request.

The Data Protection Officer will make an initial assessment to decide whether it is a valid request, or any further information is necessary.

Following this initial assessment, the Data Protection Officer will contact the Data Subject:

- *as soon as possible but no later than 5 (five) days from the day on which* the Data Protection Officer was informed on the receipt of Data Subject Access Request,
- in writing, to confirm the receipt of respective request, seek confirmation of identity or further information, if required, or decline the request if one of the *exemptions* below applies:

- a. Where the Controller instructs the OSF Entity not to deal with such request directly.
 - b. If the refusal to provide the information is consistent with the EU/EEA data protection law within the jurisdiction in which that OSF Entity is located or
 - c. Where the Data Subject Access Request is not subject to EU/EEA data protection law.
- iii. Requests for erasure, amendment, cessation of processing or to port information:
- If a request is received for the deletion of Personal Data, such a request must be considered and dealt with as appropriate by the Data Protection Officer.
 - If a request is received advising of a change in that Data Subject's Personal Data, such information must be rectified or updated accordingly if the OSF Entity sees it as legitimate.
 - If the request is to cease Processing because the rights and freedoms of the individual are prejudiced by virtue of such processing by OSF Entity, or on the basis of other compelling legitimate grounds, the matter will be referred by the Data Protection Officer to OSF Compliance department. Where the Processing undertaken by the OSF Entity is required by law, the request will not be regarded as valid.
 - If a request is to receive Personal Data in a structured, commonly used and machine-readable format and to have that data transmitted to another controller, such a request must be considered and dealt with by the Data Protection Officer.

As a general note, all queries relating to this Procedure are to be addressed to the Data Protection Officer.

OSF shall maintain a record of the Data Subject Access Requests it receives, considering the GDPR provisions.

**MODIFICATION/REVISION REGISTRATION FOR:
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