
COFACE

Appendix 03

Procedure to process data subject requests



1. OBJECTIVE

a. Purpose

This procedure describes the process for adhering to the Rights of the Data Subject as part of the General Data Protection Regulation (GDPR).

This process covers appropriate measures that are in place for internal staff to process data subject requests from individuals (employees, former employees, clients, prospects, contractors, suppliers, temporary employees, ...)

b. Scope

All personal data processed or controlled by Coface is within the scope of this procedure.

The process for obtaining / accessing the data is the same for all data subject "Rights" requests.

The following rights may be exercised by the Data Subject :

- The right to be informed
- The right of access
- The right to rectification
- The right to erasure
- The right to restrict processing
- The right to data portability
- The right to object
- Rights related to automated decision making

2. REQUEST BY THE DATA SUBJECT

2.1 Means of communication

Requests for any rights of the data subject should be **sent directly to the DPO to process**.

Requests can be made **in writing (postal or electronic) or via an online form** (if technically available on the system or internet site). If the application is made on the system or internet site, the applicant must get a dated and signed acknowledgment of receipt.

Written request shall be sent to:

Coface_dpo@coface.com

Data Protection Officer
1 Place Costes et Bellonte
92270 – Bois-Colombes
FRANCE

Reply by Coface

If the request is made in writing and Coface needs clarification or additional information to answer it, Coface DPO can contact the applicant by mail or e-mail.

If the request is made electronically, the information is provided in an electronic form in common use, unless the data subject requests otherwise (Article 12.3 of the GDPR). In this case, the modalities of transmission of information must be done in a secure way (using Secure FTP or other secure method as requested by the Data Subject).

If the request is made by post, Coface sends the personal data by post. It is desirable to do so by means of a registered letter with acknowledgment of receipt.

2.2 *No fees*

The GDPR provides a principle of **free access** for copies provided as part of an access request (Article 12.5 of the GDPR).

Coface can request payment of "reasonable fees based on administrative costs" in the following cases:

- for any additional copy requested by the person concerned;
- if the request is manifestly unfounded or excessive.

2.3 *Deadlines to respond to a request*

Coface must respond as soon as possible to a request for a right of access, **within a maximum of one month** (Article 12.3 of the GDPR).

There is a possibility of extending this deadline by further two months, "given the complexity and the number of requests", provided that the person concerned is informed within one month of receipt of the request (Article 12.3 of the GDPR).

Whether Coface answers the request for a right of access or decide to extend the period of two months, Coface must inform the data subject of any such extension within one month of receipt of the request, together with the reasons for the delay.

2.4 *Processing of the request*

The Data Protection Officer shall ensure to have obtained the minimum required information from the concerned data subject to address his or her request and if deemed necessary, obtain as much information as possible to enable the requested to be duly handled.

If a doubt about the identity of the individual making the request exists, in particular when using distance communication means, the Data Protection Officer can ask for more information regarding the data subject. Information collected shall be limited to information that is necessary to confirm who the individual making a request is. Proportionality shall always be assessed for the handling of the request.

The Data Protection Officer will ensure that a response is provided, and the request is documented.

If the data subject is not satisfied by the reply, the data subject can lodge a claim before the competent court and a complaint before the Supervisory Authority. This right is not dependent on the data subject having used the complaint handling process beforehand.