



Data Subject Access Request Policy

Version History

Version	Date	Author	Change Summary
1.11	08/06/2023	Erica Duong	Minor changes
2.0	05/03/2024	Erica Duong	Annual review, updated branding
3.0	04/30/2025	Erica Duong	Annual review

Purpose

This document establishes the process regarding handling or responding to access requests to personal data by data subjects or a third party representing the data subject's interests. It complies with the requirements outlined in ISO 27001:2022 Annex A Control 5.34.

Scope of Application

This document applies broadly across all entities owned, controlled, or operated by ComputerTalk and all staff handling customer data. "ComputerTalk" encompasses Computer Talk Technology Inc. and ComputerTalk Global Corp.

Review and Authorization

1. The Compliance Officer must review and update this document annually.
2. ComputerTalk's Executive Team authorizes this document.
3. The Executive Team approved this document on August 13, 2025.

Table of Contents

1.	Introduction.....	4
2.	Roles and Responsibilities	4
3.	Subject Access Request Process.....	4
4.	Subject Access Request Form	5
5.	Fees.....	5
6.	Complex Requests.....	6
7.	Exemptions.....	6
8.	Complaints.....	6

1. Introduction

Individuals have the right to access their personal data and supplementary information. The right of access allows individuals to be aware of and verify the lawfulness of the processing. ComputerTalk must comply with the General Data Protection Regulation (GDPR) and demonstrate accountability to the Information Commissioner's Office (ICO), where applicable.

2. Roles and Responsibilities

The overall responsibility for ensuring compliance with legislation requirements about handling subject access requests (SARs) at ComputerTalk rests with Jennifer Sutcliffe, our Data Protection Officer.

ComputerTalk's Help Desk is responsible for managing SARs submitted to the organization. Duties include, but are not limited to:

- a) Logging receipt and fulfillment of all requests
- b) Acknowledging the SAR
- c) Verifying the identity of any person making a SAR
- d) Maintaining records of requests and compliance with statutory timescales
- e) Verifying whether ComputerTalk is the controller of the data subject's data
- f) Determining whether a request is manifestly unfounded, excessive, or repetitive, and communicating this to the requestor
- g) Deciding if an exemption applies

SARs can be made in writing, electronically, or verbally. A SAR is a request from an individual (or someone acting with authority) for:

- a) Confirmation whether we process their personal data, and if so,
- b) Access to that personal data and supplementary information

If an incident or inquiry potentially involves a SAR, staff must notify dataprivacy@computer-talk.com promptly.

3. Subject Access Request Process

All SARs should be submitted to the Help Desk, where a Severity 4 ticket will be created in Dynamics to log and track the request. Before processing, the identities of the

requestor and data subject must be verified using documents such as a valid passport, identity card, driving license, birth certificate, or a recent proof of address (no older than three months).

If the request is unclear or broad, ComputerTalk may ask for clarification or specification of the information requested. ComputerTalk will verify whether the requested data is processed. If not, the requestor will be informed accordingly.

ComputerTalk will carry out the necessary database queries, record collection, and documentation to support the fulfillment of a SAR. A response will be provided within the required 30-day calendar timeframe, following GDPR. If the SAR involves customer-managed contact records available through iceManager or iceJournal, those records will be handled by authorized personnel on the customer's side.

If the SAR includes personal data about other individuals, ComputerTalk will redact such data or ensure consent is obtained before disclosure, unless an exemption applies.

The response to the SAR will include:

- a) The purpose(s) of the processing
- b) The categories of personal data concerned
- c) The recipients or categories of recipients, including any international transfers and safeguards
- d) The envisaged data retention period or the criteria used to determine it
- e) Information about rights to rectification, erasure, restriction, and objection
- f) The right to complain to the ICO
- g) The source of the data if not collected directly from the data subject
- h) Information on any automated decision-making or profiling

4. Subject Access Request Form

Requestors must complete the appropriate Data Subject Access Request Form. If acting on behalf of another individual, the Third-Party Data Subject Access Request Form must be submitted along with appropriate authorization.

5. Fees

No fee will be charged for responding to SARs unless requests are manifestly unfounded, excessive, or repetitive. In such cases, ComputerTalk may charge a

reasonable fee or refuse to act on the request, providing a written explanation within 30 days.

6. Complex Requests

For complex or voluminous requests, ComputerTalk may extend the deadline by up to an additional two months. The data subject will be notified of the extension and reasons within the original 30-day response period. If the request is refused, ComputerTalk will inform the data subject without delay and within 30 days.

7. Exemptions

Staff who believe an exemption applies must immediately notify the GDPR Committee via dataprivacy@computer-talk.com. Exempted information will be redacted, and an explanation will be provided.

8. Complaints

If a requestor is dissatisfied with the outcome of their SAR, the matter will be addressed through the complaints process. Requestors will be informed of their right to escalate the issue to the ICO.