

Data Subject Access Requests & Requests for Erasure Policy

Introduction

1. About this policy

This policy defines the internal handling of data subject access requests and requests for erasure received by Relocation Management Companies or Direct Corporate Clients of Dwellworks, LLC who have declared themselves to be Controllers and for whom we are the Processor or Sub-Processor. Additionally, this policy covers the internal handling of data subject access requests and requests for erasure received by Dwellworks, LLC related to their direct consumers of which Dwellworks, LLC is the Controller. The guidance provided in this policy should be used to ensure such requests are dealt with in a structured, transparent, and fair manner.

2. What is a data subject access request & a request for erasure?

A data subject access request is a request from an individual (the data subject), in which they ask to be provided with information regarding the personal data we process concerning them. A request for erasure is a request from an individual (data subject) in which they ask to have their personal data deleted from our systems. Under the General Data Protection Regulation (GDPR), the California Consumer Privacy Act (CCPA), and other applicable data protection laws, data subjects have the legal right to obtain from us confirmation as to whether we hold and/or process their personal data and access to the personal data, together with specific details regarding the processing of such data. Data subject also have the legal right to have their personal information deleted from our systems, subject to certain exceptions.

Data subject access requests and requests for erasure may be submitted by any individual who believes we may hold personal data concerning them. For example, we may hold data which includes, but is not limited to name, address, contact details, passport information, SSN/SIN, banking details/credit card information, employment information, and spouse and dependents information. Data subject access requests and requests for erasure can be made in any form, including via post, email, telephone, and social media.

Handling Data Subject Access Requests & Requests for Erasure

1. Responsible department / person

The Compliance Department is responsible for the handling of data subject access requests and requests for erasure made to Dwellworks, LLC. Once received, the Compliance Department will investigate and respond to the request accordingly, taking into account the requirements of GDPR, CCPA, or other applicable data protection laws.

2. Responsibilities of all other employees

The Compliance Department is solely responsible for responding to all data subject access requests and requests for erasure received by Dwellworks, LLC. All other employees are prohibited from responding to any data subject access requests or requests for erasure and for the purposes of this policy are defined as "unauthorised employees."

In the event that a data subject access request or request for erasure is received by an unauthorised employee, details of the request and any accompanying documents must be forwarded to the Compliance Department at the following email address: compliance@dwellworks.com. It is essential that requests are forwarded on the day of receipt. **When forwarding details of the request received, employees are required to use the form annexed to this policy.**

In the event that any communication is received from a Supervisory Authority (i.e. a data protection enforcement agency which may include the Attorney General's Office), the Compliance Department is to be informed immediately. Unauthorised persons are prohibited from responding to any such communications from the Supervisory Authority or other enforcement agencies.

Data Subject Access Request & Request for Erasure Guidance

The General Data Protection Regulation (Regulation (EU) 2016/679) (“GDPR”) and the California Consumer Protection Act (“CCPA”) grant European Union (“EU”) residents and California residents, respectively, the right to access your personal data, if any, held by Dwellworks. GDPR and CCPA also grant you the right to have your personal information deleted, subject to certain exceptions. Please complete this form if you wish to make a request in relation to your personal data. This is not a mandatory form – requests made in other formats will also be accepted, but this form is designed to help you in providing us with the information we need to process your request quickly and efficiently.

Which sections should I complete?

Sections 1, 2, 3, & 4	Data Subject Details Should be completed for ALL applications.
Sections 5, 6, & 7	Representative Details and Authority to Release Information to a Representative: Should only be completed if the application is being made by a representative (i.e. someone other than the data subject themselves).
Section 2	Proof of the applicant’s identity: If you do not have any of the forms of identity listed, we may, in exceptional circumstances, accept alternatives for consideration.
Section 6	Proof of the representative’s identity: If you do not have any of the forms of identity listed, we may in exceptional circumstances accept alternatives for consideration.

How long will it take to get my data or have my data erased?

Once we are satisfied that you meet the criteria for disclosure or erasure of data under the General Data Protection Regulation, and have provided sufficient information for us to confirm your identity and accept your application for processing, you should receive a response within one calendar month from that date.

However, in certain circumstances, GDPR and CCPA allow us to extend that deadline depending on the complexity of your request. We will advise you if we need to extend the response deadline.

Records may be held in several different locations in paper and electronic formats. If you only require specific information and you clearly state what that is – for example a specific document or IT-only data – then you are likely to get a quicker disclosure or erasure.

Cost

In most cases, we will not charge a fee to comply with your request. However, where the request is manifestly unfounded or excessive, we may charge a reasonable fee for the administrative costs of complying with the request.

Checklist

- Have you completed all relevant sections of the form?
- If you are submitting the form yourself, have you signed the form at Section 4?
- Do you have ready to enclose/upload two pieces of identification from the lists in Section 3 (one from each of A and B)?
- If you are a representative, have you signed the declaration in Section 5 and have ready to enclose/upload two pieces of identification from the lists in Section 6 (one from each of A and B)?
- If the form is submitted by a representative, has the data subject signed the authority in Section 7 or provided a separate signed note of authority?

Submitting your completed form

You may send your completed form and proof of identity by mail or submit online.

Mail	Email
Dwellworks, LLC Attn: Chief Privacy Officer 1317 Euclid Avenue Cleveland, Ohio 44115 United States of America	compliance@dwellworks.com

Data Subject Access Request & Request for Erasure Application

Section 1 – Applicant (Data Subject) Details

Please provide the data subject's information in the space provided below. We will only use the information you provide on this form to identify you and the personal data you are requesting access to, and to respond to your request.

First and last name:	
Any other names that you have been known by:	
Home address:	
Date of birth:	
Telephone number:	
Email address:	
Relationship with Dwellworks:	
Please provide other unique identifiers or related information, if any, to help us locate your personal data:	

Section 2 - Proof of Data Subject's Identity

We require proof of your identity before we can respond to your request. In order to prove the applicant's identity, we need to see copies of two pieces of identification, one from list A and one from list B below. Please indicate which ones you are supplying.

Please **DO NOT** send an original passport, driving licence, or identity card. We reserve the right to refuse to act on your request if we are unable to identify you. If you do not have any of these forms of identification available, please contact us for advice on other acceptable forms of identification.

List A (<u>photocopy</u> of one from below)		List B (plus one <u>original</u> from below)	
Identification that clearly shows your name and date of birth.		Documentation that clearly shows your name and current address.	
Passport/Travel Document		Tax document	
Photo driving licence		Utility bill showing current home address	
Foreign National Identity Card		Bank statement or Building Society Book	

Section 3 - Information Requested

To help us process your request quickly and efficiently, please provide as much detail as possible about the personal data you are requesting access to or erasure of.

Type of Information	Date or period when data was collected	Disclose or Erase

Section 4 - Declaration

I, _____, confirm that the information provided on this form is correct and that I am the person whose name appears on this form.

I understand that:

1. Dwellworks, LLC must confirm proof of identity and may need to contact me again for further information; and
2. My request will not be valid until Dwellworks, LLC receives all of the required information to process the request.

Signature _____ Date _____

Data Subject Access Request & Request for Erasure Application

COMPLETE SECTIONS 5, 6, & 7 ONLY IF YOU ARE A THIRD PARTY ACTING ON BEHALF OF THE DATA SUBJECT.

Section 5 - Requests Made on the Data Subject's Behalf

Please complete this section of the form with your name and contact details if you are acting on the data subject's behalf.

First and last name:	
Company name:	
Address and Postcode:	
Date of birth:	
Telephone number:	
Email address:	

Section 6 - Proof of the Representatives Identity

We require proof of your identity before we can respond to your request. In order to prove the representative's identity, we need to see copies of two pieces of identification, one from list A and one from list B below. Please indicate which ones you are submitting. Please DO NOT send an original passport, driving licence or identity card. We reserve the right to refuse to act on this request if we are unable to identify you. If you do not have any of these forms of identification available, please contact Dwellworks, LLC for advice on other acceptable forms of identification.

List A (<u>photocopy</u> of one from below)		List B (plus one <u>original</u> from below)	
Identification that clearly shows your name and date of birth.		Documentation that clearly shows your name and current address.	
Passport/Travel Document		Tax document	
Photo driving licence		Utility bill showing current home address	
Foreign National Identity Card		Bank statement or Building Society Book	

Section 7 - Authority to release information to a Representative

A representative must obtain authority from the applicant before personal data can be released or deleted. The representative should obtain the applicant's signature below or provide a separate note of authority. This must be an original signature, not a photocopy.

I hereby give my authority for the representative named in Section 6 of this form to make a Data Subject Access Request on my behalf under applicable Data Protection Legislation.	
Signature of Applicant:	Date:
Signature of Representative:	Date: