

## **Trojan Lighting Data Subject Rights Procedure**

### **1. Introduction**

Trojan Lighting is committed to protecting the privacy and rights of individuals whose personal data we process. This document outlines the procedure for responding to requests made by data subjects in accordance with the General Data Protection Regulation (GDPR).

### **2. Scope**

This procedure applies to all personal data processed by Trojan Lighting, including data concerning employees, customers, suppliers, and other stakeholders. It applies to all requests from individuals exercising their data protection rights under GDPR.

### **3. Data Subject Rights**

Under GDPR, data subjects have the following rights:

- Right to Access:
  - Individuals can request access to their personal data and details about its processing.
- Right to Rectification:
  - Individuals can request corrections to inaccurate or incomplete personal data.
- Right to Erasure ("Right to be Forgotten"):
  - Individuals can request deletion of their personal data in specific circumstances.
- Right to Restrict Processing:
  - Individuals can request restriction of data processing under certain conditions.
- Right to Data Portability:
  - Individuals can request to receive their personal data in a structured, commonly used format or have it transferred to another organisation.
- Right to Object:
  - Individuals can object to processing based on legitimate interests, direct marketing, or automated decision-making.
- Rights Related to Automated Decision-Making:
  - Individuals can request human intervention in automated decisions or challenge such decisions.

### **4. Submitting a Request**

Data subjects can submit their requests using the following methods:

- Email: [contact@trojan-lighting.co.uk](mailto:contact@trojan-lighting.co.uk)

- Post: Trojan Lighting, Rainford Industrial Estate, Unit 2, Sandwash Business Park, Sandwash Cl, Rainford WA11 8LY

All requests must include:

- Full name of the data subject.
- Contact details (email address or phone number).
- Details of the request (e.g., type of right being exercised).
- Proof of identity (e.g., copy of ID).

Acknowledging Requests

- Trojan Lighting will acknowledge receipt of a request within 5 working days.
- Requests will be logged and assigned a unique reference number.

## **5. Verification of Identity**

Before processing a request, the identity of the data subject must be verified. Acceptable methods include:

- Government-issued photo ID (e.g., passport or driving licence).
- Confirmation of account details (if applicable).

If identity cannot be verified, additional documentation may be requested.

## **6. Response Timeframes**

- Requests will be fulfilled within 1 month of receipt.
- If the request is complex, the deadline may be extended by a further 2 months, with written notification provided to the data subject.

## **7. Exemptions and Limitations**

- Requests may be refused or limited if:
  - The data is required for legal compliance.
  - Fulfilling the request would compromise another individual's rights.
  - The request is manifestly unfounded or excessive.

Refusals will include a written explanation and details of the individual's right to lodge a complaint with the Information Commissioner's Office (ICO).

## **8. Third-Party Requests**

If a request is submitted on behalf of a data subject by a third party, the following is required:

- Signed authorisation from the data subject.
- Proof of identity for both the data subject and the third party.

## **9. Recording Requests**

All requests and responses will be documented and retained for 3 years to demonstrate compliance.

## **10. Complaints and Escalations**

- Data subjects who are dissatisfied with the handling of their request can contact Trojan Lighting at [contact@trojan-lighting.co.uk](mailto:contact@trojan-lighting.co.uk).
- Complaints can also be escalated to the Information Commissioner's Office (ICO):
  - Website: <https://ico.org.uk/>
  - Phone: 0303 123 1113

## **11. Review and Updates**

This procedure will be reviewed annually and updated as necessary to ensure compliance with GDPR.

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