

## Subject Access Requests under GDPR - Guidelines

GDPR provide for reinforced/new rights for individuals (or “data subjects”) to govern how their personal data is used: right of access, right to rectify, right to be forgotten etc. (GDPR articles [15 to 21](#) - click on link for full text).

Each Brink’s country must implement a process to handle requests from data subjects to exercise their GDPR rights (a “SAR” or “Subject Access Request”). Pending a formal BCO procedure, here are few guidelines to be followed by each country.

### Step 1 – Preparing for a SAR

- Identify a single point of contact to receive GDPR rights requests. This point of contact should be easily accessible/understandable to data subjects:
  - “the management of the company” does not work
  - “your local HR representative” works
  - “gdpr-rights@brinks.lu” works; etc.
- Make this contact known in the relevant documents (e.g., privacy policy, note to employees, intranet site, etc.).

### Step 2 – Receiving a SAR

- Check the identity of the requestor by reasonable means within 48 hours max., ideally by a phone call or on-site conversation.
- Asking for official documents (e.g., ID card, passport, driving license, etc.) should be the last resort since it involves collecting more personal data. In that case, any document received should be destroyed after identity is verified.
- Inform the global or local DPO of the SAR.

### Step 3 – Locating the data

- For Right to Access, data will need to be located from structured (database), unstructured (file share, One Drive, SharePoint), and physical documents.
- Varonis can assist locating personal data in an unstructured environment: send available information on the data subject to [Varonis@brinksinc.com](mailto:Varonis@brinksinc.com)
- For Right to be Forgotten, certain data elements cannot be deleted: data which must be retained for the purposes of Contract or Legal Obligation cannot be deleted. Check with Legal or DPO.

### Step 4 - Answering a SAR

- Brink’s has **30 days** to answer a SAR.
- Answer can be by email if the request has been received by email.
- Along with copies of the data to be provided to answer the SAR, Brink’s should provide the following information, in an accompanying letter or email) :
  - purpose of the data processing (e.g., management of payroll)
  - categories of personal data concerned
  - recipients or categories of recipient to whom the personal data have been disclosed (e.g., HR dept)
  - period for which the personal data will be stored, or, if not possible, the criteria used to determine that period (e.g., statute of limitations)
  - right to request from Brink’s rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing
  - right to lodge a complaint with the local supervisory authority
  - where the personal data are not collected from the data subject, any available information as to their source
  - existence of automated decision-making, including profiling 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
  - appropriate safeguards in place in case where personal data are transferred to a third country or to an international organization.
- Copy of the full answer (data + above information) should be sent to the DPO.

**Any question on these guidelines, please contact your local DPO or the global DPO ([dpo\\_gdpr@brinksinc.com](mailto:dpo_gdpr@brinksinc.com))**