

Chapter: Data Protection	Subject: Procedures for Assistance in Executing Individuals Rights	
Document Number:	Rev: 1	Page # 1 of 5

Name	Signature
Document Authors	Dan Or-Hof, Esq. CIPP/E; CIPP/US
Approved by	Michal Finkelstein

Revision History

Revision	Description of Changes	Author	Date
1.0	Document creation	Dan Or-Hof	March 27, 2018

NOTE This document is intended for internal Leadspace use only. The document contains **CONFIDENTIAL** and **PROPRIETARY** information.

Chapter: Data Protection	Subject: Procedures for Assistance in Executing Individuals Rights	
Document Number:	Rev: 1	Page # 2 of 5

Individuals Rights – Assistance to Controllers

A. Introduction

1. Pursuant to Article 28 to the EU General Data Protection Regulation (GDPR) and taking into account the nature of Leadspace's processing of personal information related to individuals within the EU, Leadspace commits, under its agreements with relevant clients, to assist them by appropriate technical and organizational measures and insofar as this is possible, to fulfill the clients' obligation to respond to requests for exercising individuals' rights under the GDPR.
2. This policy describes the way Leadspace provides the assistance in relation to specific relevant individuals' rights.

B. Overview of the Relevant Individuals Rights Under the GDPR

1. **Right of Access** – The right to access personal data pertaining to an individual, including additional data, e.g., the purposes of processing, categories of data involved, third parties who receive the data, retention period, the right to file a complaint with the supervisory authority, the source of the data (if not collected from the individual) and details about automated processing of the data, including profiling.
2. **Right to Rectification** – The right to require the rectification of inaccurate personal data, or complete incomplete personal data concerning the individual.
3. **Right to Erasure (Right to be Forgotten)** – The right to demand erasure of personal data concerning the individual, if (i) the personal data is no longer necessary pursuant to the purposes of processing; (ii) the individual withdraws consent, if the processing is based on consent and there is no other legal ground for the processing; (iii) the individual objects to the processing and there are no overriding legitimate grounds for the processing, or the individual objects to the processing pursuant to the individual's right to object; (iv) the personal data has been unlawfully processed; (v) Leadspace must erase the personal data to comply with a legal obligation in Union or Member State law to which the Leadspace is subject; (vi) the personal data has been collected in relation to the offer of information society services to a child.

C. Rules for Handling Requests for Assistance

1. To provide the required assistance, Leadspace must receive an assistance request notice with the specific identifiers, such as full name, phone number and email address, to identify the data applicable to the individual who requested to exercise a right ("Applicant") and will further request the client to state that the client verified sufficiently the identity of the Applicant.

NOTE This document is intended for internal Leadspace use only. The document contains CONFIDENTIAL and PROPRIETARY information.

Chapter: Data Protection	Subject: Procedures for Assistance in Executing Individuals Rights	
Document Number:	Rev: 1	Page # 3 of 5

2. If Leadspace is approached directly by an Applicant, Leadspace will make commercially reasonable efforts to direct the Applicant to the relevant client and will assist such relevant client, as required under the GDPR and in accordance with the client's notice of request for assistance.
3. Upon receipt of the notice of request for assistance, the notice will be directed to Leadspace's data protection team ("DP Team") for review. The DP Team will identify the type of right that the Applicant wishes to exercise and the grounds to exercise the right.
4. To the extent that the DP Team will question the legal obligation to exercise the Applicant's right (for example, where the Applicant's request is manifestly unfounded or excessive, in particular because of its repetitive character), Leadspace will enter into a good-faith discussion with the client, to reach an amicable resolution. Leadspace may either charge a reasonable fee in accordance with the administrative costs of exercising the right or refuse to act on the request.
5. The DP Team will verify that Leadspace has sufficient identifiers to locate the relevant data to the Applicant and fill-in the form attached as **Appendix 1** to this Policy.
6. The DP Team will provide instructions to the applicable personnel to perform the necessary actions to support the Applicant's request and will provide the client with the applicable response. As necessary under the GDPR and to the extent available or feasible (e.g., the relevant data was completely removed from Leadspace's systems) without undue delay and in any case no later than 25 days following Leadspace's receipt of the client's request for assistance.
7. If the performance of the assistance by Leadspace requires additional time, due to specific difficulties in identifying the relevant data or performing the necessary actions, Leadspace will promptly notify the client of such delay.
8. The information, communication and actions under this policy will be provided free of charge if performance of the assistance requires negligible costs. Leadspace will require the client to cover its reasonable costs in all other cases.
9. The DP Team will create or assign an interface or folder in Leadspace's database that is intended to record requests for assistance. The records will include the details as set forth in **Appendix 2**.

NOTE This document is intended for internal Leadspace use only. The document contains CONFIDENTIAL and PROPRIETARY information.

Chapter: Data Protection	Subject: Procedures for Assistance in Executing Individuals Rights	
Document Number:	Rev: 1	Page # 4 of 5

Appendix 1

Reason for submitting the application: _____

Date: _____

The right that the Applicant wishes to exercise according to the GDPR:

Has the Applicant been identified? Yes / No. If so – when and in what manner?

Consultation with the technical team regarding the possibility of implementing the request:

Consultation with the legal team regarding the possibility of implementing the request:

Technical team guidelines and implementation times:

Date of sending response to the client who sent the notice of request for assistance and a short summary of the response:

Recipients of data that were updated following the request:

General comments:

NOTE This document is intended for internal Leadspace use only. The document contains CONFIDENTIAL and PROPRIETARY information.

Chapter: Data Protection	Subject: Procedures for Assistance in Executing Individuals Rights	
Document Number:	Rev: 1	Page # 5 of 5

Appendix 2

Documentation of Applicants' requests will include the following fields:

- A. Name of the Applicant.
- B. The date of receipt of the request for assistance from the client.
- C. A summary of the content of the client's request for assistance.
- D. A copy of any additional correspondence (if any) with the client and the summary of the conversations that were conducted with client (if any).
- E. The content of a legal consultation, if any.
- F. The details of the execution of the right.
- G. Any additional relevant detail.

NOTE This document is intended for internal Leadspace use only. The document contains CONFIDENTIAL and PROPRIETARY information.
