
DATA SUBJECT ACCESS REQUEST POLICY – BRAVURA SOLUTIONS

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Data Subject Access Request Policy

1. About this policy

Bravura Solutions and its affiliates (“Bravura”) are committed to complying with laws and regulations in the jurisdictions we operate in, and are committed to responding to all data subject access requests (“DSAR”) in an open and honest way, and in ensuring all personal data is processed fairly and lawfully in accordance with individuals’ rights.

Under the Australian Privacy Act (“AU Privacy Act”), individuals have a general right to access their personal data if it is held by a company. This is known as making a privacy access request. If you are an European Union (“EU”) or United Kingdom (“UK”) resident, the General Data Protection Regulation (“GDPR”) gives individuals (“Data Subjects”) who are residents of the EU or UK the right of access, commonly referred to as subject access, to their personal data. A similar right of access to personal data exists if you are a resident of South Africa, New Zealand, India or Hong Kong, under the Privacy laws in those respective countries. This policy explains the rights of Data Subjects in relation to a DSAR, and Bravura’s responsibilities when dealing with that request.

2. Individual Rights

As a Data Subject you have the right to know what personal data is held about you, and the right to receive a copy of that data from us if we hold any, as well as details of:

- the purposes for which we process your personal data including the lawful basis;
- the recipients or categories of recipient to whom your personal data have been or will be disclosed, including recipients in third countries or international organisations;
- where you did not give us the personal data, the source from which we collected your personal data;
- whether we use any automated decision making in relation to the processing of your personal data; and
- the retention periods for your personal data.

The Privacy laws referred to in section 1 above (“Privacy Laws”) apply to the processing of personal data, but not to business data. Personal data may include information that can be used to identify a person, such as name, identification number, location data or an online identifier. The most common reasons that we may hold personal data about you is if you:

- are or have been an employee or contractor of Bravura; or
- have had a service delivered to you via a contract we hold or have held with a business partner.

Under Privacy Laws, if we hold your personal data you are entitled to have access to that personal data, to have that personal data rectified if inaccurate, incomplete, misleading or irrelevant (having regard to the purpose for which it is held), to request not to receive direct marketing communications, or withdraw consent to processing of sensitive information or limit your consent to non-automated decision making.

In addition, under the GDPR, If we hold your personal data as the Data Controller you have the right to have it deleted or to object to its use, or to request restriction of processing or to have your data transferred, provided there are no legal requirements that prevent us from doing this.

Whilst you have the right to know what information is held about you at the time of your request you are not usually entitled to receive any data relating to other people (unless the information is also about them or you are acting on behalf of someone else). You should be aware that in accordance with internal policies we routinely destroy information and we are unable to recreate or provide information which was previously held but has since been routinely destroyed.

3. How to make a subject access request

You may make a DSAR either verbally or in writing by contacting us as follows:

- by writing: The Head of Information Security, Bravura Solutions (UK) Limited, 5th Floor, 201 Bishopsgate, London, EC2M 3AB;
- by email: dataprotection@bravurasolutions.com or
- by telephone: (UK) +44 207 997 3000, and ask to speak to the Head of Information Security or Human Resources Manager, and mention that you wish you make a data subject access right.

We prefer if you make a request in writing to enable us to identify all the data you require, especially where the request involves larger volumes or complex data. We recommend you use the template below (“Letter Template: Data Subject Access Request”) when making a written request. We may contact you if we are not clear about what is being requested if you make a request verbally or in writing.

Our Head of Information Security monitors compliance with this policy and can provide advice on responding to DSARs. Should you not be satisfied with how we have stored or processed your personal data, you have a right to lodge a complaint with us by contacting our Human Resources Manager or Head of Information Security.

4. What do we do when we receive a subject access request?

Identity Verification

When we receive a DSAR we will first check that we have enough information to be sure of the Data Subject’s identity. Often, we will have no reason to doubt a person’s identity, for example, if we have regularly corresponded with them. However, if we have reasonable cause to doubt a person’s identity, we can ask for any evidence we reasonably need to confirm their identity. We will not usually progress a DSAR until we have confirmed the Data Subject’s identity.

The period for responding to the DSAR is within 30 days/one calendar month or within 20 working days under the New Zealand Privacy Act and only begins when we have verified the identity of the requestor. However, we may elect to waive the requirement for the applicant to provide proof of identity if we are reasonably satisfied that we know their identity.

If you are a relative/representative of the individual concerned we will require evidence of the Data Subject’s consent for the release of their personal data. We will also require confirmation of your capacity to act on their behalf and an explanation of why you are entitled to access their information.

Information we may request from you includes:

- 2 recent utility bills of not less than 3 months old (originals only); and/or
- a certified copy of your passport, or a certified copy of a similar government-issued identity document; and/or
- proof of consent to act for a Data Subject, if applicable.

Clarifying the request

If the DSAR involves a large amount of information, we may correspond with you to clarify the specific information you are looking for.

You are entitled to request copies of emails held by Bravura containing personal data relating to you. However, Bravura’s email systems are not capable of identifying and extracting all personal data relating to a specific Data Subject only. Email searches usually result in large volumes of complex data, containing personal data and information relating to more than one person. Depending on the volume involved, requesting email data may therefore result in an extended timeframe for responding to a DSAR. Bravura processes and holds data for a large number of employees and its business partners. It is not feasible to conduct a search of every email account for a single name, and very broad requests e.g., “all emails relating to me”, are more likely to be considered manifestly unfounded and excessive, for example under the AU Privacy Act or under the GDPR. Therefore, to enable us to identify emails containing personal data relating to you, we will need you to provide the following information with your request:

- names of the sender/recipients of the emails
- dates (or date ranges) of the emails, e.g., from 25 May 2018 to 31 July 2019; and
- any other relevant information that might assist Bravura to locate specific information you require.

Collating the information

This is not a limited set of circumstances and we will conduct a reasonable and proportionate search of all our systems and records to check for information in relation to all DSARs. We will gather any manually or electronically held information (including emails) and identify any information provided by a third party or which identifies a third party. We will write to that third party asking whether there is any reason why this information should not be disclosed. We do not have to supply the information to you unless the other party has provided their consent, or it is reasonable to do so without their consent. If the third-party objects to the information being disclosed, we may seek legal advice on what action we should take.

Before sharing any information that relates to third parties, we will, where possible, anonymise information that identifies third parties not already known to the Data Subject and edit information that might affect another party's privacy unless we have consent from the third party to provide it. The Data Subject access right is about information (i.e., personal data) and not about documentation. Accordingly, we may extract the applicant's personal data from documentation or redact information which is not the applicant's personal data when preparing our response. Where appropriate we may provide relevant contextual information to assist the applicant. Bravura does not perform automated decision making or profiling.

Issuing our response

We aim to comply with a request without undue delay and within 30 days (AU Privacy Act) or within one calendar month (GDPR), or within 20 working days (New Zealand Privacy Act) of receipt of the request or (if later) within one month of receipt of:

- any requested information to clarify the request; or
- any information requested to confirm the requestor's identity; or
- a fee.

Copies of the information will be sent to you electronically wherever possible, or if this is not technically possible, by post, which may be collected in person; or sent by post (recorded delivery). We will only share your information with a third party if you have written to us and given your consent for us to provide it to someone else.

In rare circumstances where we cannot meet that deadline, if the request is complex or we have received a number of requests from the individual, we will contact you within that calendar month to tell you the reasons why and give you a realistic timeframe of when we will provide the information being sought. This should be no longer than 3 months from the original date of a valid DSAR.

Bravura is committed to meeting all reasonable requests in accordance with the Privacy Laws. If we hold no information about you, we will let you know, and whether exemptions or refusals apply.

5. Will we charge a fee?

We will not charge a fee for most DSARs. However, we retain the right to charge a "reasonable fee" for the administrative costs of complying with the DSAR if:

- it is manifestly unfounded or excessive; or
- an individual requests further copies of their data following a request.

We may also refuse to comply with a manifestly unfounded or excessive request. In both instances, if this applies to the DSAR we will contact you within one month of receiving your request to let you know.

6. What if you identify an error in our records, or want us to stop processing your data?

If you want us to correct errors or restrict the processing of your data or erase your data or object to the processing of your data, tell us in the same way as detailed in section 3 above. For example, we have either 30 days (under the AU Privacy Act), one calendar month (under the GDPR), or 20 working days (under the New Zealand Privacy Act) to respond to you and will

follow a similar process for confirmation of your identity, investigation, review and communicating with you as described in this policy.

If we agree that the information is inaccurate, we will correct it and where practicable, destroy the inaccurate information. We will consider informing any relevant third party of the correction. If we do not agree or feel unable to decide whether the information is inaccurate, we will make a note of the alleged error and keep this on file. We will provide you with written notice that either we have complied with your request, intend to comply with it or state the extent to which we will comply with it and why. Further information can be found at:

- UK - [Home | ICO](#); or
- Poland - [Home Page - UODO](#); or
- AUS - [Home — OAIC](#)
- New Zealand - [Office of the Privacy Commissioner | Home](#)
- South Africa - [Home | InfoRegSA \(justice.gov.za\)](#)
- Hong Kong - [PCPD](#)

7. Complaints

Complaints about responses should be referred to us using the contact details in section 3 above. Your complaint will be investigated, and you will receive a response to your complaint within one calendar month of receipt of your complaint. If you remain dissatisfied with the outcome of your complaint you have the right to make a further complaint to the relevant supervisory authority (e.g., OAIC, or the ICO of the UK) or to start legal action to enforce your subject access rights. See the above website links for more information:

8. Policy review

If we decide to change this policy, we will publish a new version to our website at [Bravura Solutions - Market-leading provider of financial software solutions](#)

LETTER TEMPLATE – DATA SUBJECT ACCESS REQUEST

[Your full address]
 [Phone number]
 [The date]

The Head of Information Security
 Bravura Solutions
 5th Floor
 201 Bishopsgate
 London
 EC2M 3AB
 United Kingdom

Dear Madam

DATA SUBJECT ACCESS REQUEST

(use this form for a request to correct, restrict, erase or object)

Please supply me with personal data about me that you hold, process or transfer for which I am entitled to receive a copy thereof under data protection law (e.g., AU Privacy Act, the GDPR, NZ Privacy Act, South Africa Protection of Personal Information Act, India Information Technology Act, Hong Kong Personal Data (Privacy) Ordinance). I have explained what personal data or other actions I require in this form:

Personal Details

Data Subject's Name and DOB	
Address likely to have been recorded by Bravura	
Telephone	
Email	
Any other information that may help us locate your personal data	

Specific Details of the Information Requested

What personal data, when and with whom	
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Representatives

(only complete if you are acting as the representative for a Data Subject. We may still need to contact the Data Subject where proof of authorisation or identity are required)

Representative's name		Relationship to Data Subject	
Telephone no.		Email	
Address			
<p>I confirm that I am the authorised representative of the named Data Subject</p> <p>Representatives' Signature: _____</p> <p>Date signed: _____</p>			

Right to data portability, right to be forgotten, right to data restriction

Please complete this section if you wish to invoke the following rights as a Data Subject:

Rights as a Data Subject	I require the following (please tick)	Reason
Right to be forgotten – please delete my personal data		Please explain why you require your personal data to be deleted
Right to have errors corrected		Please list what errors require to be corrected:
Right to restrict processing my personal data		Please explain why you require restriction or stopping of processing:

Rights as a Data Subject	I require the following (please tick)	Reason
Please transfer my personal data to a third party		Please explain why and to whom Bravura should transfer your personal data. We may contact you for additional information and require confirmation from the third party.

If you need any more data from me, or a fee, please let me know as soon as possible. It may be helpful for you to know that data protection law e.g., AU Privacy Act, the GDPR, NZ Privacy Act, South Africa Protection of Personal Information Act, India Information Technology Act, Hong Kong Personal Data (Privacy) Ordinance, requires you to respond to a request for data within a specified period of time e.g., 30 days or one calendar month.

If you do not normally deal with these requests, please pass this letter to your Human Resources Manager or Chief Operating Officer. If you need advice on dealing with this request, the relevant Supervisory Authority can assist you, located at:

- UK - [Home | ICO](#); or
- Poland - [Home Page - UODO](#); or
- AUS - [Home — Oaic](#)
- New Zealand - [Office of the Privacy Commissioner | Home](#)
- South Africa - [Home | InfoRegSA \(justice.gov.za\)](#)
- Hong Kong - [PCPD](#)

Yours faithfully

[Full Name]

[Signature]

For emailed requests, please return this form to: dataprotection@bravurasolutions.com

