**Guide to using
Wired Relations' templates**
Wired Relations' templates\* can be used directly in your work with data protection and information security - but can also be used as inspiration for your own material. You can modify them as needed to make them exactly as you want them.

**NOTE!** There may be sections that are not relevant for all companies. If this is the case, it will be clearly indicated in the text.

|  | Text boxes in the document contain focus points and good advice. Please note that the text boxes should be removed from the final version of the specific policy or procedure. |  |
| --- | --- | --- |

There will be places in the text where you are prompted to insert the company’s name or other information. In these cases, it will be marked as follows: *[insert company's name]*.

At the end of each document, there will be a table that provides an overview of the document's version, the latest update, and who is responsible for the document.

|  | Here are some additional tips for using Wired Relations' templates: |  |
| --- | --- | --- |
|  | * You can add or remove sections, change the wording, and add your own logo and branding.
 |  |
|  | * Stay up-to-date with your templates. Data protection and information security regulations are evolving rapidly, so it's crucial to keep your templates current.
 |  |
|  | Should you have any inquiries concerning the templates, please feel free to contact us. |  |

### **Data Subject Rights Policy**

When *[insert company's name]* processes personal data, the company must be aware that the individuals whose personal data is being processed have various rights.

First and foremost, the data subject has the right to receive information about how their data is processed. This is also known as the data controller's obligation to provide information.

The General Data Protection Regulation also grants the data subject the following rights:

* Right of access
* Right to rectification
* Right to erasure
* Right to restriction of processing
* Right to object to processing
* Right to data portability
* Right not to be subject to a decision based solely on automated processing, including profiling

A data subject can exercise their rights by submitting a request to *[insert company's name]*.

The request can be made by email, letter, telephone, or in person, and must be answered without undue delay and at the latest within one month of the request being made.

Before a request is answered, it is important that *[insert company's name]* is sure of the identity of the person making the request. This can be done, for example, by having the person present identification or by having the request submitted via (in Denmark the secure digital post system “Digital Post”). If a representative submits a request on behalf of the data subject, *[insert company's name]* must ensure that a valid power of attorney has been issued.

If there is any doubt about how to handle a request from a data subject, *[insert relevant person in the company]* should be contacted.

**1. The right to receive information about how one's own data is processed**

When *[insert company's name]*collects or receives data about the data subject, a number of pieces of information must be provided to the data subject. The data subject must, among other things, be informed about how the data is processed and for what purpose.

A distinction is made between the situation where *[insert company's name]* collects personal data from the data subject themselves, and the situation where *[insert company's name]* collects data about the data subject from others. The obligation to provide information must be fulfilled simultaneously or as soon as possible after *[insert company's name]* has collected or received the data.

The obligation to provide information must be observed on one's own initiative, and we will, as far as possible, ensure that this is done in writing, for example by preparing relevant privacy policies.

**2. The right of access**

The data subject's right of access to their personal data means that *[insert company's name]* is obliged to provide the personal data being processed about them.

2.1 What must be provided?

It is important that *[insert company's name]* practically provides a copy of the personal data being processed about the data subject (this can either be in the form of a copy of the data, or in a single document). Only data about the data subject themselves must be provided, and if other personal data appears in the documents, this must be removed or otherwise obscured before being provided.

In addition, the data subject has the right to receive a number of pieces of information about the processing of personal data that is carried out. The purpose of this is to give the data subject the opportunity to see what personal data *[insert company's name]* is processing about them, and at the same time create transparency about how the data is processed. On this basis, the data subject can check whether the correct data is being processed.

A separate procedure has been developed for handling and responding to requests for access.

**3. The right to rectification, erasure or restriction of processing of personal data**

3.1 Rectification of personal data

This right means in practice that the data subject has the right to have incorrect data about themselves corrected. In addition, the data subject has the right to have incomplete data completed, for example by providing supplementary information.

The data controller already has an obligation to ensure on their own initiative that the data processed is correct and complete, cf. the basic principles in Article 5 of the General Data Protection Regulation.

In addition to rectifying the incorrect personal data in their own systems, *[insert company's name]* must also, on its own initiative, notify those to whom *[insert company's name]* may have disclosed the data, so that the data can be corrected there as well.

3.2 Erasure (the right to be forgotten)

The data subject has the right to have their personal data erased without undue delay when one of the following conditions applies:

* It is no longer necessary to have the data about the data subject for the purposes for which it was collected.
* The processing is based on consent, and the data subject now withdraws their consent.
* You are processing the data unlawfully (without a basis in Chapter II of the General Data Protection Regulation).
* You are obliged to erase the data as a result of EU law or national law in a Member State.
* You are obliged to erase the data as a consequence of the data subject exercising their right to object (see more below).
* You are a provider of an information society service (e.g. a social network) and you have based your processing of personal data about a data subject on consent given by the data subject's parental authority holder, and the data subject now withdraws their consent themselves after turning 15 years old.

The data must be deleted in such a way that it cannot be restored. This means that the data must also be deleted from any backup.

However, the data must not be deleted if we are otherwise obliged to store the data, or if the data is necessary for a legal claim to be established, exercised or defended.

If it is assessed that a request for erasure should be granted, and the data has been disclosed, *[insert company's name]* has an obligation to inform the recipient of the erasure request.

3.3 Restriction of processing of personal data

The data subject has the right, in some cases, to have the processing of their personal data restricted, so that the data may not be subject to any processing other than storage.

The data subject has the right to have their personal data restricted when one of the following conditions applies:

* The data subject contests the accuracy of the personal data.
* The data is processed unlawfully, and the data subject does not want the data deleted.
* The data is no longer needed, but it is necessary for a legal claim to be established, exercised or defended.
* The data subject has objected to the processing. For the period during which it is assessed whether our legitimate interests outweigh the data subject's interests, processing must be restricted.

## **4. Right to Object to Processing**

The data subject may at any time object to the processing of their personal data, even if it is otherwise lawful. In this situation, it must be assessed whether the objection is justified, even if *[insert company's name]* is processing the personal data lawfully.

The data subject may only object to lawful processing based on Article 6(1)(e) or (f) of the GDPR.

Furthermore, the data subject is entitled at any time to object to the processing of their personal data for direct marketing purposes, including profiling related to such direct marketing.

## **5. Right to Data Portability**

The data subject has the right to receive their personal data that they have provided to *[insert company's name]* in a structured, commonly used, and machine-readable format for personal use without hindrance. The right to data portability also gives the data subject the right to transmit this personal data from one data controller to another. The personal data must be able to be moved, copied, and transferred from one IT environment to another without hindrance, if technically possible. The purpose of this is to give the data subject increased control over their personal data.

## **6. Right not to be Subject to a Decision Based Solely on Automated Processing, Including Profiling**

*[Insert company's name]* does not make decisions based solely on automated processing, including profiling.

## **Exercising Data Subject Rights**

If a data subject wishes to exercise one or more rights, they should contact *[insert company's name and email address]*. If the request is received through a different channel, it should be forwarded to the relevant email address.

**Specifically for our role as a data processor**

As a data processor, *[insert company's name]* is obligated to contribute to the data controller's requests from data subjects. This means, in concrete terms, that the data controller can contact *[insert company's name]* to request *[insert company's name]* contribution, and [*[insert company's name]* is obligated to comply with this request.

**Document information**

| Document version |  |
| --- | --- |
| Date of Issue for this version |  |
| Responsible Person |  |
| Status |  |