

Recognize Services Inc

Data Subject Rights and Requests Policy and Procedures

APPROVAL STATUS

Approval date	May14, 2018
Policy owner	Chief Technology Officer
Approval	Data Protection Officer
Next update	Annual update required (minimum)
Version history	Version 1.0: May 14, 2018

Overview

Individuals (data subjects) have rights to privacy and management of their data. Data subjects can leverage these rights for data held or processed by Recognize by issuing a Data Subject Request (DSR) to either their data controller or to Recognize directly. Recognize will respond to all requests from data subjects or data controllers in a timely manner following the below policies and procedures.

Request Details

Data subject requests will be completed within 1 month of receiving the request. Requests will always be completed free of charge provided they are not unfounded, excessive, or repetitive. If a request is deemed unfounded, excessive, or repetitive, a charge may be applied that is based on the administrative cost to provide that information. The data controller or data subject will be provided a DSR form to formally file the request (see Appendix A).

Request Mechanisms

Data subject requests can be made through the following mechanisms:

1. Data subjects: User profile in recognizeapp.com
2. Data controllers: Company Admin > Compliance
3. Data subjects or Controllers:
 1. Email: support@recognizeapp.com
 2. Phone: 866-288-0373
 3. Mail: 220 4th Street, Suite 200, Oakland, CA 94607

Limitations

If the information requested in a DSR reveals details directly or indirectly about another person, we will have to seek the consent of that person before we can release that information. In certain circumstances, where disclosure would adversely affect the rights and freedoms of others, we may not be able to disclose the information, in which case the data subject or controller will be informed promptly and given full reasons for that decision.

Types of Data

Recognize may store information in any of the following high level types of data pertaining to a data subject:

1. Profile Data
2. Program Data
3. Technical Data

Profile Data

Profile data is stored in the Recognize database and is directly associated with a data subject and only that individual. Examples of profile data are name, email, phone, hire date, notification preferences, etc. More information about profile data stored can be found in our [Privacy Policy](#).

Program Data

Program data is data generated in or via the Recognize application, services, or integrations that may be related to one or many data subjects or the data-controller itself. Examples of this may include recognition data, team memberships, nomination data, and tasks submitted.

Technical Data

Technical data is data that is created or transmitted by a data subject in the course of using the Recognize application, integrations, or services. Examples of this include HTTP requests, ip addresses, session data, and data specific to the action performed. Technical data may accompany profile data and program data.

Data storage

Internal Data Storage

All the data associated with a data subject may be stored in the Recognize database associated with the data controller, or in secondary locations such as application logs. The Recognize database is the only permanent storage mechanism for personal data. Secondary storage is subject to data retention policies detailed in Recognize's [Terms of Service](#) and [Privacy Policy](#).

Third Party Data Storage

Recognize may transmit certain data to third parties in accordance with our [Third Party Privacy document](#). All Third Parties that Recognize may transmit customer data to will be GDPR compliant and will adhere to compliant data subject request policies. Upon receiving a DSR, Recognize will work with Third Parties to follow up, manage, and relay Third Party compliance with the request.

Types of Requests

Recognize will provide tools or support to respond to the following requests:

1. Discovery and Access
2. Rectification
3. Restriction

4. Deletion
5. Export

Discovery and Access

Recognize will provide the ability for data subjects and data controllers to search and discover information related to a data subject that may be the subject of a DSR.

Notifications

1. Data Controller Initiated: Recognize Support will notify the data subject that a DSR has been initiated for them. The notification will include who requested it, the nature of the request, and any other pertinent information about the request.
2. Data Subject Initiated: Recognize Support will notify the representative on file for the data controller that the data subject has initiated a DSR. The notification will include who requested it, the nature of the request, and any other pertinent information about the request.

Process

Recognize will provide in-application options for data controllers and data subjects to search for information about a data subject as well as about any pending or completed DSRs.

1. Data controllers will have access to a company admin portal where they can search for and view individual data subjects.
2. Data subjects will have access to their user profile where they can see the information stored about them.
3. Data controllers and subjects will also be given an option to contact support to do further discovery for a data subject's data and any relevant pending or completed DSR's.

Rectification

Data subjects and controllers can make changes or implement other requested actions on personal data, where applicable. Requests to rectify data located in secondary storage systems may be subject to additional fees given the intensive nature of such a task.

1. Data controllers can make changes to personal data via the Company Admin > Accounts portal in recognizeapp.com
2. Data subjects can make changes to personal data via the User profile > Edit function in recognizeapp.com
3. Data controllers or subjects can submit an electronic or physical request to rectify a data subjects data. See [Request Mechanisms](#).

Restriction

Data subjects or controllers can request to restrict the processing of personal data. Restriction of processing of personal data may effect the delivery of services provided by Recognize. Restriction requests can be made using one of [Request Mechanisms](#).

Deletion

Data subjects or controllers can request to permanently remove personal data subject to the limitations described above.

[Profile data deletion](#)

Recognize will delete any profile information requested in a DSR by overwriting the selected data fields with empty strings. For data integrity reasons, Recognize will leave an empty shell record in our database. Since program data is handled separately, and may refer to profile data such as a user's name, Recognize will display an alternate value such as "Employee".

Program data deletion

If the program data deletion request does not involve other data subjects, Recognize will dutifully complete the request. For deletion requests that involve other data subjects, such as deleting recognition data, Recognize will seek consent from the other individuals. If consent is not achieved, the data subject or controller will be informed promptly and given full reasons for that decision.

Technical data deletion

Technical data is stored in temporary secondary storage and is subject to Recognize's retention policy. Technical data is deleted by default when it exceeds its retention window. If a data subject or controller would like data deleted from secondary storage prior to the retention window, Recognize will comply but may have to charge additional fees due to the intensive nature of such a request.

Export

Recognize will provide any data requested in a DSR in a machine readable format so that the data meets the GDPR "portability" standards. This format may be Excel, Csv, or JSON. Recognize will dutifully comply with requests to export profile and program data. However, technical data may take additional resources to provide for export and may be subject to additional fees.

Appendix A: Data Subject Request Form

SUBJECT ACCESS REQUEST FORM

You should complete this form if you want us to supply you with a copy of any personal data we hold about you. You are currently entitled to receive this information under the Data Protection Act 1998 (DPA) and will continue to be under the EU General Data Protection Regulation (GDPR), which comes into effect on 25 May 2018. We will also provide you with information about any processing of your personal data that is being carried out, the retention periods which apply to your personal data, and any rights to rectification, erasure, or restriction of processing that may exist.

We will endeavor to respond promptly and in any event within one month of the latest of the following:

- Our receipt of your written request; or
- Our receipt of any further information we may ask you to provide to enable us to comply with your request.

The information you supply in this form will only be used for the purposes of identifying the personal data you are requesting and responding to your request. You are not obliged to complete this form to make a request, but doing so will make it easier for us to process your request quickly.

SECTION 1: Details of the person requesting information

Full Name	
Address	
Contact Telephone Number	
Email Address	

SECTION 2: Are you the data subject?

Please tick the appropriate box and read the instructions which follow it.

YES: I am the data subject. I enclose proof of my identity (see below).

(please go to section 4)

NO: I am acting on behalf of the data subject. I have enclosed the data subject's written authority and proof of the data subject's identity and my own identity (see below).

(please go to section 3)

To ensure we are releasing data to the right person we require you to provide us with proof of your identity and of your address. Please supply us with a photocopy or scanned image (do not send the originals) of one of both of the following:

1) Proof of Identity

Passport, photo driving licence, national identity card, birth certificate.

2) Proof of Address

Utility bill, bank statement, credit card statement (no more than 3 months old);

current driving licence; current TV licence; local authority tax bill, HMRC tax document (no more than 1 year old).

If we are not satisfied you are who you claim to be, we reserve the right to refuse to grant your request.

SECTION 3

Details of the data subject (if different from section 1)

Full Name	
Address	
Contact Telephone Number	
Email Address	

SECTION 4: What information are you seeking?

Please describe the information you are seeking. Please provide any relevant details you think will help us to identify the information you require.

Please note that if the information you request reveals details directly or indirectly about another person we will have to seek the consent of that person before we can

let you see that information. In certain circumstances, where disclosure would adversely affect the rights and freedoms of others, we may not be able to disclose the information to you, in which case you will be informed promptly and given full reasons for that decision.

While in most cases we will be happy to provide you with copies of the information you request, we nevertheless reserve the right, in accordance with section 8(2) of the DPA, not to provide you with copies of information requested if to do so would take "disproportionate effort", or in accordance with Article 12 of the GDPR to charge a fee or refuse the request if it is considered to be "manifestly unfounded or excessive". However we will make every effort to provide you with a satisfactory form of access or summary of information if suitable.

SECTION 5: Information about the collection and processing of data

If you want information about any of the following, please tick the boxes:

- Why we are processing your personal data
- To whom your personal data are disclosed
- The source of your personal data

SECTION 7: Declaration

Please note that any attempt to mislead may result in prosecution.

I confirm that I have read and understood the terms of this subject access form and certify that the information given in this application to Recognize Services Inc is true. I understand that it is necessary for Recognize Services Inc to confirm my / the data subject's identity and it may be necessary to obtain more detailed information in order to locate the correct personal data.

Signed..... Date

Documents which must accompany this application:

- Evidence of your identity (see section 2)
- Evidence of the data subject's identity (if different from above)
- Authorization from the data subject to act on their behalf (if applicable)

Please return the completed form to:

Data Protection Officer
Recognize Services Inc
220 4th Street, Suite 200
Oakland, CA 94607 United States of America

Email: support@recognizeapp.com Telephone: 866-288-0373

Correcting Information

If after you have received the information you have requested you believe that:

- The information is inaccurate or out of date; or
- We should no longer be holding that information; or
- We are using your information for a purpose of which you were unaware;
- We may have passed inaccurate information about you to someone else;

then you should notify our Data Protection Officer at once.