

Data Subject Access Request Form

Please read the Guidance Notes which accompany this form before completing the form.

Please complete the form in block capitals.

Please submit your completed request form as a secure email attachment to info@approach-services.com

We aim to respond to your request within one month of receiving a fully completed form and proof of identity.

1 Requester Name (Data Subject) and Contact Information

Please provide the data subject's information in the space provided below.

If you are making this request on the data subject's behalf, you should provide your name and contact information in Section 3.

Full legal name of data subject:	
Any other names that you have been known by (including nicknames):	
Home address (including postcode):	
Date of birth:	
Telephone number:	
Email address: <i>(Please list all emails that you may have used in interactions with us)</i>	
Current or former employees of Approach Services: <i>(Please provide your employee identification number and your approximate dates of employment)</i>	
Please provide any other unique identifiers or related information to help us locate your personal data:	

2 Proof of Data Subject's Identity

Please provide identification that clearly shows the name, date of birth, and current address of the person the request is about.

Acceptable ID: a photocopy or a scanned image of your passport or photo identification such as a driver's license, national identification number card or similar, plus evidence of address such as a utility bill dated within the last three (3) months, if your photo identification does not include address information. If you have changed your name, please provide the relevant documents evidencing the change.

We will be unable to act on any request until we are able to identify you.

3 Requests Made on a Data Subject's Behalf

Please complete this section of the form with your name and contact details if you are acting on the data subject's behalf.

Full legal name of representative:	
Home address (including postcode):	
Date of birth:	
Telephone number:	
Email address:	

3.1 Proof of Authorised Person's Identity and Authority to Act

Please provide identification for the authorised person. The authorised person should provide an ID that meets the criteria set out in section 2 above in addition to the data subject's identification, which is still required.

Please provide a copy of your legal authority to act. We accept a copy of the following as proof of your legal authority to act on the data subject's behalf: a written consent signed by the data subject and dated within the last three (3) months, a certified copy of a Power of Attorney, or evidence of parental responsibility.

4 Information Requested

Which right do you wish to exercise? *(Please tick one box only)*

- Art 15: Right of access (commonly DSAR: data subject access request)
- Art 16: Right to rectification (i.e. to correct personal data or to complete incomplete data)
- Art 17: Right to erasure (Right to be forgotten)

Art 18: Right to restriction of processing

Art 20: Right to data portability

Art 21: Right to object to processing

To help us process your request quickly and efficiently, in the box below, please provide as much detail as possible about the personal data you are requesting access to or correction or erasure of. Please include time frames, dates, names, types of documents, file numbers, or any other information to help us locate your personal data.

We will contact you for additional information if the scope of your request is unclear or does not provide sufficient information for us to search (for example, if you request "all information about me"). We will begin processing your request as soon as we have verified your identity and have all the information we need to locate your personal data.

*Please specify your request here. Continue on additional sheets if necessary.
If you are requesting erasure or restriction of processing, please specify on what grounds you are requesting this.*

4.1 Art 21: Right to object to processing

To help us process your request quickly and efficiently, please indicate with a checkmark which personal data processing you are objecting to:

Processing for direct marketing purposes, including profiling related to direct marketing.

Processing that the organisation considers necessary for the organisation's or a third party's legitimate interests under GDPR Article 6(1)(f).

5 Signature and Acknowledgment

I confirm that the information provided on this form is correct and that I am the person whose name appears on this form.

I understand that:

1. Approach Services must confirm proof of identity and may need to contact me again for further information;

2. My request will not be valid until Approach Services receives all of the required information to process the request; and
3. I am entitled to one free copy of the personal data I have requested and acknowledge that Approach Services may charge a reasonable fee based on administrative costs for any further copies I request.

We will supply one copy of the relevant personal data in electronic format.

If you would like to receive a copy of the personal data in hard copy instead, please tick the box.

I would like a hard copy instead of an electronic copy.

Signature:	
Print Name:	
Date:	

6 Authorised Person Signature

I confirm that I am authorised to act on behalf of the data subject. I understand that Approach Services must verify my identity and legal authority to act on the data subject's behalf and request additional verifying information.

Signature:	
Print Name:	
Date:	

Check:

Have you provided:

- ▲ Identification for the data subject?
- ▲ Identification for the authorised person (if applicable)?
- ▲ Proof of authorisation for the authorised person (if applicable)?

Please submit your completed request form as a secure email attachment to info@approach-services.com. We aim to respond to your request within one month of receiving a fully completed form and proof of identity.

Data Subject Access Request Form (GDPR) – Guidance Notes

Articles 15-22 of the EU General Data Protection Regulation (Regulation (EU) 2016/679) (GDPR) grant you certain rights with regard to your personal data held by Approach Services, including the right to obtain confirmation that we process your personal data, receive certain information about the processing of your personal data, and obtain a copy of the personal data we process.

The GDPR (European General Data Protection Regulation) gives data subjects a number of rights regarding their personal data. These are:

- ▲ Art 15: Right of access (commonly DSAR: data subject access request)
- ▲ Art 16: Right to rectification (i.e. to correct personal data, or to complete incomplete data)
- ▲ Art 17: Right to erasure (right to be forgotten)
- ▲ Art 18: Right to restriction of processing
- ▲ Art 20: Right to data portability
- ▲ Art 21: Right to object to processing
- ▲ Art 22: Right to engage with automated decision making & profiling (Article 19 intentionally omitted, it does not confer an independent right)

Please submit your completed request form as an email attachment to info@approach-services.com.

We aim to respond to your request within one month of receiving a fully completed form and proof of identity.

In addition to exercising your Article 15-22 rights, the GDPR also grants you the right to make a complaint with the local data protection authority. In the UK, this is the Information Commissioner's Office.

For more information on your data protection rights, see Approach Services' Privacy Policy available at: <https://approach-services.com/privacy-policy/>

Understanding the form:

1 Requester Name (Data Subject) and Contact Information

Please provide the data subject's information by completing the form which accompanies these notes.

If you are making this request on the data subject's behalf, you should provide your name and contact information in Section 3 of the form. We will only use the information you provide on this form to identify you and the personal data you are requesting access to and respond to your request.

2 Proof of Data Subject's Identity

We require proof of your identity before we can respond to your request. To help us establish your identity, you must provide identification that clearly shows your name, date of birth, and current address. We accept a photocopy or a scanned image of one of the following as proof of identity: passport or photo identification such as a driver's license, national identification number card or similar, plus evidence of address such as a utility bill dated within the last three (3) months if your photo identification does not include address information. If you have changed your name, please provide the relevant documents evidencing the change.

If you do not have any of these forms of identification available, please contact info@approach-services.com for advice on other acceptable forms of identification.

We may request additional information from you to help confirm your identity and your right to data and provide you with the personal data we hold about you. We reserve the right to refuse to act on your request if we are unable to identify you.

3 Requests Made on a Data Subject's Behalf

Please complete section 3 of the form with your name and contact details if you are acting on the data subject's behalf.

We require proof of your identity before we can respond to your access request. To help us establish your identity, you must provide identification that clearly shows your name, date of birth, and current address. We accept a photocopy or a scanned image of one of the following as proof of identity: passport or photo identification such as a driver's license, national identification number card or similar, plus evidence of address such as a utility bill dated within the last three (3) months if your photo identification does not include address information.

If you do not have any of these forms of identification available, please contact info@approach-services.com for advice on other acceptable forms of identification.

We also require proof of the data subject's identity before we can respond to the request. To help us establish the data subject's identity, you must provide identification that clearly shows the data subject's name, date of birth, and current address. We accept a photocopy or a scanned image of one of the following as proof of identity: passport or photo identification such as a driver's license, national identification number card or similar, plus evidence of address such as a utility bill dated within the last three (3) months if the data subject's photo identification does not include address information. If the data subject has changed its name, please provide the relevant documents evidencing the change.

We accept a copy of the following as proof of your legal authority to act on the data subject's behalf: a written consent signed by the data subject and dated within the last three (3) months, a certified copy of a Power of Attorney, or evidence of parental responsibility.

We may request additional information from you to help confirm your identity or the data subject's identity. We reserve the right to refuse to act on your request if we are unable to identify the data subject or verify your legal authority to act on the data subject's behalf.

4 Information Requested

Please read the section relating to the type of request you wish to make, and then provide information by completing the form which accompanies these notes.

a. Article 15 Request for Access

To help us process your request quickly and efficiently, please provide as much detail as possible about the personal data you are requesting access to. Please include time frames, dates, names, types of documents, file numbers, or any other information to help us locate your personal data.

We will contact you for additional information if the scope of your request is unclear or does not provide sufficient information for us to conduct a search (for example, if you request "all information about me"). We will begin processing your access request as soon as we have verified your identity and have all of the information we need to locate your personal data.

In response to your request, we will provide you with the information required by Article 15 of the GDPR, including information on:

- ▲ The purposes of the processing.
- ▲ Categories of personal data processed.
- ▲ Recipients or categories of recipients who receive personal data from us.
- ▲ How long do we store the personal data or the criteria we use to determine retention periods.
- ▲ Information on the personal data's source if we do not collect it directly from you.
- ▲ Whether we use automated decision-making, including profiling, the auto-decision logic used, and the consequences of this processing.
- ▲ Your right to:
 - ▲ request correction or erasure of your personal data;
 - ▲ restrict or object to certain types of processing with respect to your personal data; and
 - ▲ make a complaint with the local data protection authority.

If the information you request reveals personal data about a third party, we will either seek that individual's consent before responding to your request, or we will redact third parties' personal data before responding. If we are unable to provide you with access to your personal data because disclosure would violate the rights and freedoms of third parties, we will notify you of this decision.

Applicable law may allow or require us to refuse to provide you with access to some or all of the personal data that we hold about you, or we may have destroyed, erased, or made your personal data anonymous in accordance with our record retention obligations and practices. If we cannot provide you with access to your personal data, we will inform you of the reasons why, subject to any legal or regulatory restrictions.

b. Art 16: Right to rectification (i.e. to correct personal data, or to complete incomplete data)

To help us process your request quickly and efficiently, please provide as much detail as possible about the personal data you would like us to correct. Please include time frames, dates, names, types of documents, file numbers, or any other information to help us locate your personal data. Your request should specify the data that is incorrect or incomplete and include a supplementary statement you would like us to record if necessary.

We will contact you for additional information if the scope of your request is unclear or does not provide sufficient information for us to locate the relevant personal data. We will begin processing your correction request as soon as we have verified your identity and have all of the information we need to locate the relevant personal data.

We will communicate the correction of the personal data to each recipient to whom we disclosed the personal data (for example, our third-party service providers who process the data on our behalf) unless this is impossible or involves disproportionate effort. We will also inform you about those recipients if you request them.

Applicable law may allow or require us to refuse to correct your personal data, or we may have destroyed, erased, or made your personal data anonymous in accordance with our record retention obligations and practices. If we cannot correct your personal data, we will inform you of the reasons why, subject to any legal or regulatory restrictions.

c. Art 17: Right to erasure (right to be forgotten)

Under Article 17, you have the right to request the erasure of your personal data if one of the following grounds applies:

- ▲ The personal data is no longer necessary for the purpose we collected it for.
- ▲ You withdrew your consent to our processing activities, and no other legal justification for processing applies.
- ▲ You are objecting under GDPR Article 21(1) to:
 - ▲ processing that is necessary for us to perform a task in the public interest or in the exercise of our official authority; and
 - ▲ there are no overriding legitimate grounds to process the personal data.
- ▲ You are objecting under GDPR Article 21(1) to:
 - ▲ processing that is necessary to pursue our or a third party's legitimate interests; and
 - ▲ there are no overriding legitimate grounds to process the personal data.
- ▲ You are objecting under GDPR Article 21(2) to processing for direct marketing purposes.
- ▲ We unlawfully processed your personal data.
- ▲ EU or member state law requires us to erase your personal data to comply with a legal obligation.
- ▲ We collected the personal data in the context of offering online services to children under GDPR Article 8(1). (*Approach Services does not offer services to children*)

To help us process your request quickly and efficiently, please provide as much detail about the personal data you are requesting erasure of and the above ground or grounds you are relying on to request erasure of your personal data.

If we made the personal data that is the subject of your erasure request public, we will take reasonable steps, including technical measures, to inform other organisations processing your personal data that you have requested erasure, including any links to and copies of the personal data.

We will communicate the erasure of the personal data to each recipient to whom we disclosed the personal data (for example, our third-party service providers who process the data on our behalf) unless this is impossible or involves disproportionate effort. We will also inform you about those recipients if you request them.

We will contact you for additional information if the scope of your request is unclear or does not provide sufficient information for us to conduct a search (for example, if you request the erasure of "all information about me").

Applicable law may allow or require us to refuse to act on your request, or we may have destroyed, erased, or made your personal data anonymous in accordance with our record retention obligations and practices. If we cannot honour your erasure request, we will inform you of the reasons why, subject to any legal or regulatory restrictions. If we determine that the personal data you are requesting to erase is not subject to Article 17, we will inform you of this decision.

We will begin processing your erasure request as soon as we have verified your identity and have all of the information we need to locate your relevant personal data.

d. Art 18: Right to restriction of processing

Under Article 18, you have the right to request that we restrict the processing of your personal data, subject to certain limited exceptions, when:

- ▲ You contest the accuracy of the personal data we process about you. We must restrict processing the contested data until we can verify the accuracy of your personal data.
- ▲ We are unlawfully processing your personal data.
- ▲ We no longer need to process your personal data, but you need the personal data for the establishment, exercise, or defence of legal claims.

- ▲ You are objecting under Article 21(1) for processing that we:
 - ▲ consider necessary to perform a task in the public interest under GDPR Article 6(1)(e); or
 - ▲ consider necessary for our or a third party's legitimate interests under GDPR Article 6(1)(f).

If you object to processing that we perform under Articles 6(1)(e) or 6(1)(f), we will restrict the challenged processing activity pending verification of whether our or a third party's legitimate interests override your interests. To help us process your request quickly and efficiently, please provide as much detail about the personal data you are requesting us to restrict the processing of and the above ground or grounds you are relying on for your processing restriction request.

We will contact you for additional information if the scope of your request is unclear or does not provide sufficient information for us to conduct a search (for example, if you request a processing restriction for "all information about me"). We will begin processing your restriction request as soon as we have verified your identity and have all of the information we need to locate your personal data.

Applicable law may allow or require us to refuse to act on your request, or we may have destroyed, erased, or made your personal data anonymous in accordance with our record retention obligations and practices. If we cannot comply with your processing restriction request, we will inform you of the reasons why, subject to any legal or regulatory restrictions.

e. Art 20: Right to data portability

Under Article 20, you have the right to receive a copy of certain personal data that you provided to us, or the right to transmit that personal data to another data controller, if we use automated means to process the personal data and we either:

- ▲ Process the personal data with your consent.
- ▲ Process the personal data because it is necessary for us to perform a contract with you.

Personal data provided by you includes:

- ▲ Information that you knowingly and actively provided to us, such as:
 - ▲ name;
 - ▲ contact information;
 - ▲ username;
 - ▲ age; and
 - ▲ billing details.
- ▲ Information generated by and collected from your activities while using our services or devices, for example:
 - ▲ search history;
 - ▲ account history;
 - ▲ purchase history;
 - ▲ traffic data; or
 - ▲ location data.

Your data portability right does not apply to personal data we hold in paper files. It also does not apply to data inferred by or derived by us from the data provided by you such as data we generate by analysing your personal data.

In response to your request, we will provide you with a copy of the personal data covered by the Article 20 data portability right in a structured, commonly used, and machine-readable format or we will transfer the relevant personal data to another data controller at your request if technically feasible.

If the information you request reveals personal data about a third party, we will either seek that individual's consent before responding to your request, or we will redact third parties' personal data before responding. If we are unable to provide you with a copy of your personal data because disclosure would violate the rights and freedoms of third parties, we will notify you of this decision.

Applicable law may allow or require us to refuse to act on your request, or we may have destroyed, erased, or made your personal data anonymous in accordance with our record retention obligations and practices. If we cannot provide you with a copy of or transfer your personal data to another data controller, we will inform you of the reasons why, subject to any legal or regulatory restrictions. If we determine that the personal data you are requesting a copy of is not subject to Article 20, we will inform you of this decision.

We will begin processing your data portability request as soon as we have verified your identity and have all of the information we need to locate your relevant personal data.

f. Art 21: Right to object to processing

To help us process your request quickly and efficiently, when you complete the form, please indicate which personal data processing you are objecting to.

Approach Services does perform:

- ▲ Processing for direct marketing purposes, including profiling related to direct marketing.
- ▲ Processing that the organisation considers necessary for the organisation's or a third party's legitimate interests under GDPR Article 6(1)(f).

Approach Services does not perform:

- ▲ Processing for scientific or historical research purposes or statistical research purposes or
- ▲ Processing that the organisation considers necessary to perform a task in the public interest under GDPR Article 6(1)(e).

If you object to personal data processing for direct marketing purposes, we will no longer process your personal data for those purposes. For personal data processing objections other than direct marketing purposes, Approach Services may continue to process personal data that is the subject of your objection under certain circumstances. If we cannot honour your personal data processing objection, we will inform you of the reasons why, subject to any legal or regulatory restrictions.

Applicable law may allow or require us to refuse to act on your processing objection, or we may have destroyed, erased, or made your personal data anonymous in accordance with our record retention obligations and practices. If we cannot honour your processing objection request, we will inform you of the reasons why, subject to any legal or regulatory restrictions. If we determine that the data processing you are objecting to is not subject to Article 21, we will inform you of this decision.

We will begin processing your objection request as soon as we have verified your identity and have all of the information we need to locate your relevant personal data.

g. Art 22: Right to engage with automated decision making & profiling

Approach Services does not perform such activities.