

HOWSPACE SUBJECT ACCESS REQUEST PROCEDURE

1. Scope

This Subject Access Request (“SAR”) procedure covers all personal data that is processed by Howspace Oy and its subsidiaries.

Section 15 of GDPR grants each data subject the right to obtain from the controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and the following information:

- A. the purposes of the processing;
- B. the categories of personal data concerned;
- C. the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organizations;
- D. where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
- E. the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing;
- F. the right to lodge a complaint with a supervisory authority;
- G. where the personal data are not collected from the data subject, any available information as to their source;
- H. the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

Where personal data are transferred to a third country outside or to an international organization, the data subject shall have the right to be informed of the appropriate safeguards pursuant to Article 46 relating to the transfer.

2. Responsibilities

Howspace’s Data Protection Officer (“DPO”) shall be responsible for the application and functionality of this procedure and shall handle all Subject Access Requests (“SARs”). The DPO shall report to the Chief Operations Officer on all matters relating to SARs.

3. Procedure

3.1 General

All SARs are made using the Howspace Subject Access Request Form (see below **Exhibit 1**). The data subject is required to provide evidence of his or her identity by way of a current passport or driving license and his or her signature must be cross-referenced with the signature provided on the Subject Access Request form.

The following information must be provided by the data subject on the Subject Access Request Form: the personal data that is being requested, whether specific data or all data held by Howspace Oy and where it is being held.

Howspace Oy is required to record the date on which the Howspace Subject Access Request Form, with the accompanying identification evidence, is submitted.

Howspace Oy has 1 month from this date to provide to the data subject the personal data requested. Should Howspace Oy fail to provide the requested information within the one month window, this shall be in direct breach of the GDPR, unless in the event of justified exceptional circumstances. In such event, Howspace still has the duty to inform the data subject within 1 month about not meeting the 1 month timeline.

It is vital that the Subject Access Form is sent to the DPO straight away at privacy@howspace.com to ensure that the requested data is collected within the 1 month window. The DPO will carry out data collection by one of the following steps:

- A. Collecting the personal data requested; or
- B. Carrying out a search of all electronic and hard-copy databases including manual files, backup and archived files as well as email folders and archives.

At no time may personal data ever be altered or destroyed in order to avoid disclosure.

3.2 Responsibilities

The DPO is responsible for the following:

- A. Keeping a record of all SARs made, including the date on which the SAR was received;
- B. Reviewing all the documents provided to a data subject pursuant to a SAR to check for the mention of any third parties and if a third party is mentioned, to prevent the disclosure of the identity of the third party to the data subject, or to seek written consent from the third party as to the disclosure of their identity.

3.3 Personal data exemption categories

The following data exemption categories apply, meaning that Howspace Oy does not have to provide personal data covered below:

- The prevention and detection of crime;
- Negotiations with the data subject request maker;
- Management forecasts;
- Confidential references provided by Howspace Oy;
- Data covered by legal professional privilege;
- Data used for research, statistical or historical reasons.

Personal data provided by Howspace Oy to a data subject pursuant to a SAR shall be in electronic format, unless the SAR expressly requests otherwise.

4. Document owner

The DPO is the owner of this policy document and must ensure that it is periodically reviewed according to the review requirements contained herein.

EXHIBIT 1

SUBJECT ACCESS REQUEST FORM

Data Subject details

Title: _____

Name: _____

E-mail address _____

Phone number: _____

Date of birth: _____

Identification document: Passport / Identification card / Driver license

Details of requested data: _____

Date and place of signature: _____

Signature data subject

This SAR should be sent to privacy@howspace.com.