Information Request Procedure
SeaStar IT

Respond without delay; must be *completed* within **28 days maximum.**

General Procedure
1. Record the date that the request was received.
2. Analyze the request to identify they type of request. Refer to SeaStar's *Data Map* to identify if this information is held.
   a. If anything needs to be clarified about the request, or if they need additional help with the request, you may contact the individual for more information.
3. If the identity of the individual is in question, you can ask for only as much information as needed to identify them.

A – Confirmation and Access
1. If the individual is requesting ***confirmation*** that SeaStar is holding and processing pieces of their personal information, we must provide that confirmation in writing (replying by letter or email depending on how the request was received). Refer to the *Data Map* to verify the location and use of the data.
2. If the individual is requesting a ***copy*** of their personal information, this must be provided. Refer to the *Data Map* to identify where this information can be accessed.
3. In most situations, access to information is **free**. If, however at this stage, the request appears to be 'excessive' or repetitive, a minimal administrative fee may be charged. The individual must receive an estimate of this cost, and must agree before the request is undertaken.
4. Provide the individual the information they are requesting in **electronic** form (i.e. export the data from our system, ideally as a .csv or .xml file).
5. If the individual wants to send the information in question to another business or organization, we must provide them with the data in a format that can be easily moved, copied, or transferred. *(GDPR – Right of Data Portability)*
6. When sending the information, include the contact information for SeaStar's *Privacy Officer* in case they have any questions.
7. Access to personal information **<u>cannot</u>** be given under the following circumstances:
   a. If disclosure would reveal personal information about someone else
   b. If the information is protected by solicitor-client privilege
   c. If disclosure would reveal confidential commercial information
   d. If disclosure could reasonably be expected to threaten the life or security of another individual
   e. If the information was collected in relation to an investigation under the law, and it would be reasonable to expect that the availability or accuracy of the information needed in the investigation would be compromised if access is given.

   f. If the information was generated in the course of a formal dispute resolution process

8. If the information that is exempt under the above conditions can be severed or removed, that must be done, and the individual must be given access to the remaining information.
9. If access cannot be given under one of the previous exemptions, the individual must be notified with an explanation of the decision, including the specific exemption applied, and informed of their right to complain to a supervisory authority.

B – Accuracy

1. If an individual informs us that a piece of personal information is factually inaccurate, we must correct this in our records.
2. The change must also be transmitted to any parties that had access to the original information.
3. If the information cannot be easily updated right away, the information should be *restricted* from further processing until the information is corrected.
4. The individual must be notified once the information is made accurate.

C – Erasure

1. An individual can request that their personal information be deleted in the following circumstances:
   a. If the personal information is no longer necessary for the purpose that it was collected
   b. If the individual withdraws consent to use the data, or objects to its usage in non-consent contexts
   c. If the erasure is in compliance with a legal obligation
2. An individual's right to erasure does not apply if processing that data is necessary for one of the following reasons:
   a. To exercise the right of freedom of expression and information
   b. In compliance with a legal obligation
   c. To perform a task carried out in the 'public interest' or in exercise of an official authority
   d. For the establishment, exercise or defense of legal claims
3. If erasure cannot be completed under one of the previous exemptions, the individual must be notified with an explanation of the decision, including the specific exemption applied, and informed of their right to complain to a supervisory authority.
4. If the information in question has been disclosed to external parties, they should be informed of the erasure, and the individual must be informed of these external recipients.

D – Restrict Processing

1. An individual can request that their personal information no longer be processed. In such a case, their personal information can be *stored*, but not *processed*. This can be requested in the following circumstances:

      a. If personal information is no longer needed (and subject to erasure), but the individual needs it to establish, exercise or defend a legal claim

      b. If the individual has objected to the processing of their data, and we are considering their objection request *(GDPR – Right to Object)*

2. If a restriction cannot be implemented under one of the previous exemptions, the individual must be notified with an explanation of the decision, including the specific exemption applied, and informed of their right to complain to a supervisory authority.

3. If the information in question has been disclosed to external parties, they should be informed of the restriction, and the individual must be informed of these external recipients.

E – Complaint

1. If a privacy complaint is received from an individual, it should be forwarded to SeaStar's *Privacy Officer*, who will consider the basis of the complaint, and address any issues brought forward.

2. Individuals should also be informed of their right to complain to a supervisory authority if the issue cannot be resolved.