

RMB Automotive

## **GDPR Data Processing Restriction Policy**

Last updated 14/05/2018

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### **Summary**

Individuals have the right to 'block' or suppress processing of Personal Data. When processing is restricted, we are permitted to store the Personal Data, but not further process it. We can retain just enough information about the individual to ensure that the restriction is respected in future.

### **When does the right to restrict processing apply?**

We will be required to restrict the processing of Personal Data in the following circumstances:

- Where an individual contests the accuracy of the Personal Data, we should restrict the processing until we have verified the accuracy of the Personal Data.
- Where an individual has objected to the processing (where it was necessary for the performance of a public interest task or purpose of legitimate interests), and we are considering whether our organisation's legitimate grounds override those of the individual.
- When processing is unlawful and the individual opposes erasure and requests restriction instead.
- If we no longer need the Personal Data but the individual requires the data to establish, exercise or defend a legal claim.

We may need to review procedures to ensure we are able to determine where we may be required to restrict the processing of Personal Data.

If we have disclosed the Personal Data in question to others, we must contact each recipient and inform them of the restriction on the processing of the Personal Data - unless this proves impossible or involves disproportionate effort. If asked to, we must also inform the individuals about these recipients.

We must inform individuals when we decide to lift a restriction on processing.

### **Right of Access**

All Data Subjects have the "Right of Access", the Subject Access Request is the formal process for a Data Subject requesting "Right of Access" to the PII (Personally Identifiable Information) held about them. The Data Subject may respond with a "Corrective Action Request" based on their GDPR Rights. It is important to process these requests correctly, accurately and in a timely fashion.

### **Rights**

1. The right to be informed
2. The right of access
3. The right to rectification
4. The right to erasure
5. The right to restrict processing
6. The right to data portability
7. The right to object
8. Rights in relation to automated decision making and profiling

If the Data Subject requests rectification, erasure, restricted processing, data portability, objection or the right restrict/stop automated decision making and profiling. Ensure the corrections are made in a timely fashion and a record of the action taken for future reference.

GDPR rules require that proof be demonstrated that the action has taken place as requested, this can be problematic if not documented correctly. Remember to provide proof of any amendments with the response when you send it.

Make sure the Data Management team is kept informed at all stages and is kept up to date throughout the whole process; they will be able to advise and assist if required.

The Data Management Team should be contacted at [GDPR@rmbauto.co.uk](mailto:GDPR@rmbauto.co.uk) with all requests.

#### **Version History**

01 – Data Processing Restriction Policy 14/05/2018 – initial document approved by Chris Jennings