



**Ancillary Policy  
to the Data Protection Policy ("Main Policy") on  
Data Privacy Rights Management Process**



## **1. Introduction**

1.1 This policy addresses how entities within the Harel Mallac Group deal with requests and/or queries received from or on behalf of data subjects whose data is being processed by such entities within the Harel Mallac Group. Furthermore, this policy details the Group's data privacy governance structure in order to promote the implementation of this policy.

1.2 This policy must be read in conjunction with the Main Policy and shall not affect any other obligations under law. In the event of any conflict between this policy and the Main Policy the terms of this policy shall prevail.

1.3 This Policy shall form an integral part of the Main Policy and any capitalized, technical and/or legal terms herein shall have the same meanings ascribed to them as in the Main Policy.

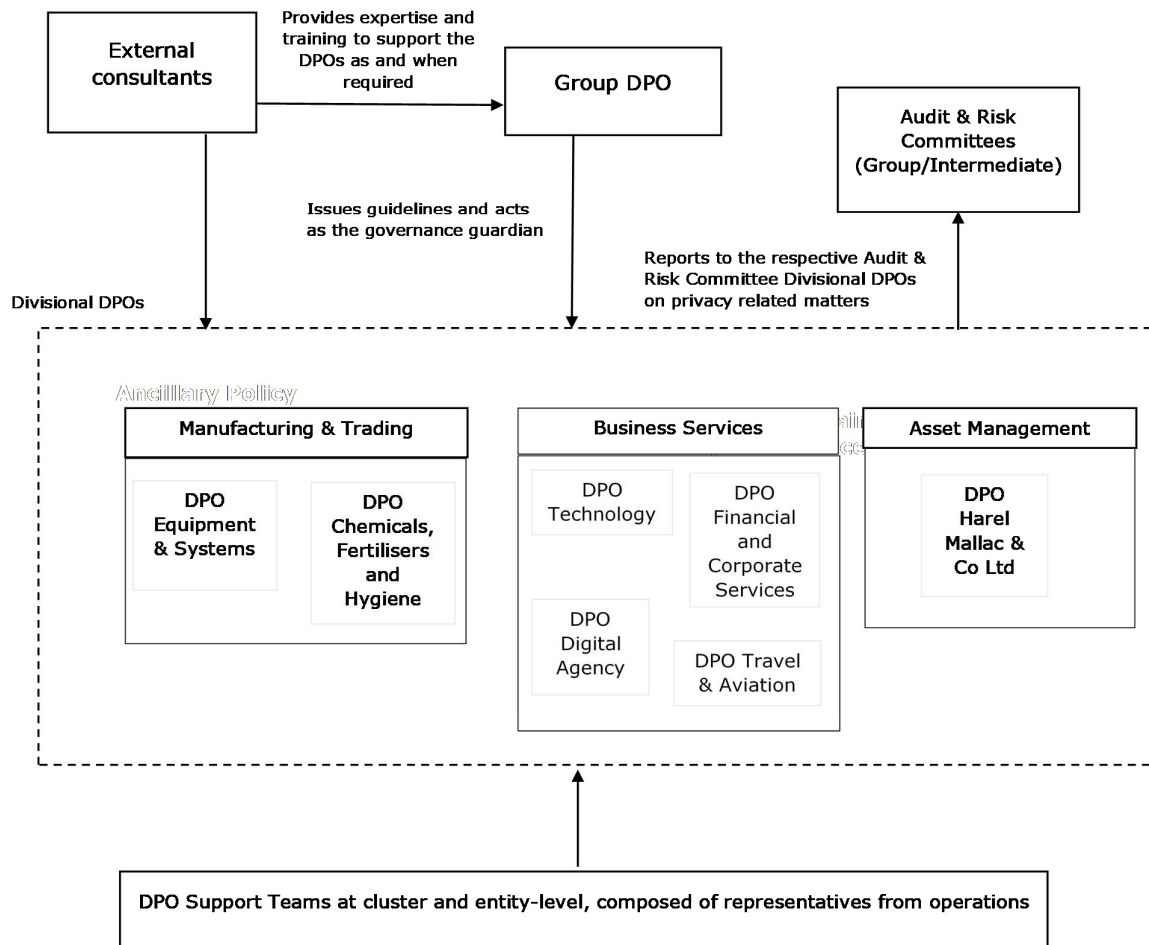
## **2. This Policy**

2.1 This policy is in furtherance of the rights of the data subject and clause 6.3 and sub clauses of the Main Policy as follows:

A data subject has the right to:

- Know what personal data the controller holds on him/her
- Obtain a copy of his/her personal data
- Rectify any of his/her personal data
- Request for the erasure of his/her personal data
- Restrict the processing performed on his/her personal data
- Object to the processing of his/her personal data
- Request for his/her personal data to be transported to another controller
- Not to be subject to decision based solely on automated processing, e.g. profiling.

**2.2 Data Privacy Governance Structure of the Harel Mallac Group is as follows:**



2.3 Should the data subject decide to exercise his/her rights as regards to the above, the data subject must address his/her request and/or query by filing in and submitting to the divisional DPO the relevant standard format form(s) as follows:

- Appendix 1: Subject Access Request Form**
- Appendix 2: Update or Removal Request Form**

2.4 The request and/or query shall be responded within one (1) month or any other statutory delay, unless the request and/or query is complex or numerous.

2.5 There is no fee for making such a request and/or query. However, if your request and/or query is manifestly unfounded or excessive, entities within the Harel Mallac Group may charge a reasonable administrative fee or may also refuse to respond to your request and/or query where lawfully permitted.

2.6 Requests to cease processing of personal data will only be entertained where there are no other lawful grounds to process such personal data and consent of data subjects is not required.

2.7 This Policy is applicable to all the entities within the Harel Mallac Group.

2.8 The Board of Directors reserves the sole rights to bring any amendments or revisions to this policy as and when it deems fit.

**Policy Information**

**Policy prepared by:**

**Group Head of Legal Affairs**

**Approved by the Board on:**

**09<sup>th</sup> December 2019**

**Policy came into effect on:**

**15<sup>th</sup> December 2019**

**Appendix 1: SUBJECT ACCESS REQUEST FORM**

1. Details of the person requesting the information:

Full name: \_\_\_\_\_

Address:  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

Telephone No. \_\_\_\_\_  
 Fax No. \_\_\_\_\_  
 Email: \_\_\_\_\_

2. Are you the Data Subject? (please tick where applicable)

Yes   
 No

3. If you are the Data Subject, please provide proof of identity (driver's licence, National Identity Card, birth certificate are acceptable, including photocopy although you may be required to show the original).

4. If you are not the Data Subject, have you been authorised to make this request on behalf of the Data Subject? (please tick where applicable)

Yes   
 No

Please provide proof of your identity, as above.

5. If you are authorised to make this request on behalf of the Data Subject, please state your relationship with the Data Subject and enclose a copy of such authority.

\_\_\_\_\_  
 \_\_\_\_\_

6. Details of the Data Subject, if different from 1 above:

Full name: \_\_\_\_\_  
 Address: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

Telephone No. \_\_\_\_\_  
 Fax No. \_\_\_\_\_  
 Email: \_\_\_\_\_

7. What is your relationship (if you are the Data Subject) or the relationship of the Data Subject with our organisation? Please give details

\_\_\_\_\_  
 \_\_\_\_\_

8. Are you requesting access to specific data? If so, please give details:

\_\_\_\_\_  
 \_\_\_\_\_

9. Please give the name of the organisation ('data controller') by which the personal data was collected. You may also specify the purpose for which, such data was collected by the data controller if you wish:

\_\_\_\_\_  
 \_\_\_\_\_

10. If your request is a general request for personal data, please indicate the records that you would like to be searched for that data: (please tick where applicable)

- Human Resources/Payroll;
- Finance;
- Secretariat;
- Legal;
- Communication;
- IT;
- Equipment & System
- Chemical, Hygiene & Fertilisers
- Business Services;
- Other; Please specify  
 \_\_\_\_\_

11. I \_\_\_\_\_,  
hereby certify that the information given  
on this application is true. I hereby  
acknowledge and accept as follows: i)  
that the data controller shall be entitled  
to deny access to any personal data,  
where it has not been satisfied as to the  
identity or authorisation of the Data  
Subject; ii) the data controller shall be  
entitled to suppress access to personal  
data where such disclosure would  
mean disclosing personal data relating  
to a third party; and iii) to pay an  
administrative fee that shall be payable  
to the data controller upon request, in  
respect of processing or complying with  
this request, should the request involve  
heavy photocopying.

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Signed \_\_\_\_\_ Date \_\_\_\_\_

**Please return this form to the Data  
Protection Officer of the concerned  
company within the Harel Mallac  
Group (at the designated address)  
or the Group Data Protection Officer  
of the Harel Mallac Group at the  
following address: 18<sup>th</sup> Edith Cavell  
Street, Port Louis.**

**Documents that must accompany  
this application are:**

- Proof of identity of personal  
requesting access to personal  
data;
- Proof of identity of Data  
Subject, if different from the  
above;
- Evidence of authorisation from  
Data Subject to make this  
request, if applicable;

**OFFICE USE ONLY:**

**Request received by:** \_\_\_\_\_

**Signed:** \_\_\_\_\_

**Request completed on:** \_\_\_\_\_

**Signed:** \_\_\_\_\_

**Notes:**

**Appendix 2: UPDATE OR REMOVAL REQUEST FORM**

Email: \_\_\_\_\_

1. Details of the person requesting the update or removal of personal data held in our records:

Full name: \_\_\_\_\_

Address: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Telephone No. \_\_\_\_\_

Fax No. \_\_\_\_\_

Email: \_\_\_\_\_

2. Are you the Data Subject? (please tick where applicable)

Yes

No

3. If you are the Data Subject, please provide proof of identity (driver's licence, National Identity Card, birth certificate are acceptable, including photocopy although you may be required to show the original).

4. If you are not the Data Subject, have you been authorised to make this request on behalf of the Data Subject? (please tick where applicable)

Yes

No

Please provide proof of your identity, as above.

5. If you are authorised to make this request on behalf of the Data Subject, please state your relationship with the Data Subject and enclose a copy of such authority.

\_\_\_\_\_  
\_\_\_\_\_

6. Details of the Data Subject, if different from 1 above:

Full name: \_\_\_\_\_

Address: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Telephone No. \_\_\_\_\_

Fax No. \_\_\_\_\_

7. What is your relationship (if you are the Data Subject) or the relationship of the Data Subject with our organisation? Please give details.

\_\_\_\_\_

8. Please give the name of the organisation ('data controller') by which the personal data was collected. You may also specify the purpose for which such data was collected by the data controller if you wish:

\_\_\_\_\_

9. Are you requesting to modify or erase/remove specific data? If so, please give details, with being as precise as possible:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

10. If your request is a general request for removal of personal data, please indicate the records from which you would like the data to be removed (please tick where applicable):

Human Resources/Payroll;

Finance;

Secretariat;

Legal;

Communication;

IT;

Equipment & System;

Chemical, Hygiene and Fertilisers;

Business Services;

Other; Please specify

\_\_\_\_\_

All

11. I \_\_\_\_\_,  
hereby certify that the information given  
on this application is true. I hereby  
acknowledge and accept as follows: i)  
that the data controller may refuse to  
update or erase any personal data  
where it has not been satisfied as to the  
identity or authorisation of the Data  
Subject; ii) the data controller may  
refuse to modify the data where it has  
not been satisfied as to the  
inaccurateness of the personal data;  
and/or iii) that the data controller shall  
be entitled to refuse such request  
where it is lawfully entitled to process  
such personal data without the Data  
Subject's consent under the Data  
Protection laws and regulations in  
force.

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Signed \_\_\_\_\_ Date \_\_\_\_\_

**Please return this form to the Data Protection Officer of the concerned company within the Harel Mallac Group (at the designated address) or the Group Data Protection Officer of the Harel Mallac Group at the following address: 18<sup>th</sup> Edith Cavell Street, Port Louis.**

**Documents that must accompany this application are:**

- Proof of identity of personal requesting access to personal data;
- Proof of identity of Data Subject, if different from the above;
- Evidence of authorisation from Data Subject to make this request, if applicable;

**OFFICE USE ONLY:**

**Request received by:** \_\_\_\_\_

**Signed:** \_\_\_\_\_

**Request completed on:** \_\_\_\_\_

**Signed:** \_\_\_\_\_

**Notes:**

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