

**CRANE PENSION TRUSTEE COMPANY (UK) LTD AND
CRANE UK GROUP LIFE ASSURANCE SCHEME (THE "SCHEME")****THE GENERAL DATA PROTECTION REGULATIONS ("GDPR")
DATA SUBJECT RIGHTS POLICY**General

- This document sets out the Scheme trustee's ("**Trustee's**") policy for dealing with requests from data subjects to exercise their rights under the GDPR.

Trustee Policy

- Data subject requests will be dealt with by Scott Dalrymple, HR Vice President ("**DSR Officer**") plus e-mailed to the DSR group e-mail at CPSDSR@cranebsu.com
- The Trustee and relevant third parties providing services in relation to the Scheme ("**Third Parties**"), acting as data processors or joint data controllers, will be provided with full details of the DSR Officer and the DSR group e-mail. Any request from a data subject is to be shared with the DSR Officer and the DSR group e-mail as soon as possible after receipt by any person.
- On receipt of a data subject's rights request, the DSR Officer will:
 - Verify the request: determine if it is a subject access request, right to be forgotten request, right to rectify data request, withdrawal of consent, right to restrict processing request;
 - If necessary, verify the identity of the person making the request; and
 - Verify the extent of the request.
- Once verification has occurred, the DSR Officer will:
 - Notify all relevant Third Parties (to the extent necessary) and the directors of the Trustee (or any sub-committee to whom it has delegated responsibility for such matters) of the request;
 - Send a confirmation to the DSR group e-mail that a data subject request has been received, confirming the nature of the request and that the request has been verified as valid;
 - Record the nature of the request and the timeframe for compliance; and
 - Liaise with such persons as necessary to collate/delete/amend/restrict the data, or to note the withdrawal of consent, in respect of relevant data to deal with the data subject's request.
- If a request is not deemed verified for any reason (a point on which the DSR Officer should, where appropriate, seek legal advice) the DSR Officer will confirm that to the relevant Third Parties, the Trustee, the DSR group e-mail and the data subject.
- Responses to the request:
 - The DSR Officer will, in relation to a **subject access request**:
 - acknowledge receipt of the request as soon as possible and, in so doing, state whether it will reply within one month or explain why more time is required;

- provide information requested in an appropriate format (e.g. electronically where the request has been made electronically). The information should include (as a minimum):
 - a copy of the data being processed with care being taken that the information relates to the applicant;
 - a statement explaining the purpose(s) of processing the data;
 - a description of the categories of personal data being processed;
 - details of the recipient / categories of recipient to whom the personal data has been or will be disclosed (in particular recipients in third countries or international organisations);
 - where possible, the period envisaged for which the personal data will be stored or, if not possible, the criteria used to determine that period;
 - 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;
 - the right to lodge a complaint with a supervisory authority (vis. the ICO);
 - where the personal data has not been collected from the data subject, available information as to their source;
 - the existence of automated decision-making including profiling and meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject;
 - explanation of codes or abbreviations. These should be explained clearly so the information provided may be fully understood; and
 - (where applicable) a note of any fees to be charged (e.g. where additional copies have been requested).
- Where the data subject request is a **right to erasure or amendment or to restrict the data**, written confirmation will be provided to the data subject:
 - that the relevant action has occurred;
 - the date on which the relevant action occurred; and
 - that all relevant Third Parties, being those who have received the data concerned from the Trustee, have also been advised of the need to take the relevant action and have confirmed that they have done so.
- If the request is for the **withdrawal of consent**:
 - the withdrawal of consent is to be noted and communicated to all relevant Third Parties who have been given access to the data, along with the date of the withdrawal; and
 - confirmation is to be provided to the data subject that the withdrawal has been communicated to all relevant Third Parties.

- The completion of the response to the data subject's request will be recorded, including the nature of the request, the date that it was complied with, and confirmation of notification to both the data subject and also to any Third Parties who needed to act on the request made.
- All action is to be completed within the timescales specified in legislation in relation to the nature of the data subject's rights request made.