

Data Subject Rights Procedure (UK GDPR/GDPR)

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1. Scope

Covers support provided by the processor to controllers for rights requests, including access, rectification, erasure, restriction, portability, and objection.

2. Role Split

- Controller: receives and decides rights requests.
- Processor: assists controller under Article 28(3)(e), using appropriate technical and organizational measures.

3. Intake and Validation

When a rights request is forwarded by a controller:

1. Confirm controller authorization.
2. Confirm request scope (data subject, system scope, date range).
3. Validate identity assurance completed by controller.
4. Assign a tracking reference and SLA target.

4. Operational Response by Right Type

- Access: provide relevant personal data extracts and metadata.
- Rectification: update inaccurate records per controller instruction.
- Erasure: execute deletion workflow and return completion evidence.
- Restriction: suppress processing where technically feasible.
- Portability: provide structured export (for example CSV/JSON where appropriate).
- Objection: support controller decision and technical enforcement where applicable.

5. Timelines

Processor internal target: acknowledge controller request within [2] business days. Processor delivery target: provide requested assistance within [10] business days, unless extended by complexity. Controller remains responsible for statutory response deadlines.

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6. Auditability

Each request record should contain:

- request reference
- controller contact
- request type and scope
- actions taken
- completion date
- exceptions and rationale

7. Refusal or Limitation Cases

Processor may refuse or limit action where:

- instruction is unlawful,
- request conflicts with legal hold,
- requested action exceeds processor role without controller authorization. Any refusal is documented and communicated with reasons.