



5.5. Right to rectification

5.5.1. If a Data Subject informs us that Personal Data held by ~~DDDDDD~~ is inaccurate or incomplete, requesting that it be rectified, the Personal Data in question shall be rectified and the Data Subject informed of that rectification within one month of receipt the Data Subject's notice. This can be extended by up to two months in the case of complex requests and, in such cases, the Data Subject shall be informed of the need for the extension within one month of receipt of the request. The decision to inform the Data Subject that there is a need for an extension to the period required to carry out the rectification shall only be made by the HSE & Compliance Manager

5.5.2. If any affected Personal Data has been disclosed to third parties, those parties shall be informed of any rectification of that Personal Data, (unless it is impossible or would require disproportionate effort to do so).

5.6. The right to erasure (also referred to as the 'right to be forgotten')

5.6.1. ***Data subjects may request that ~~DDDDDD~~ erases the Personal Data it holds about them in the following circumstances:***

- it is no longer necessary for us to hold that Personal Data with respect to the purpose for which it was originally collected or processed;
- the Data Subject wishes to withdraw their consent to us holding and processing their Personal Data;
- the Data Subject objects to us holding and processing their Personal Data (and there is no overriding legitimate grounds to allow us to continue doing so);
- the Personal Data has been processed unlawfully; or
- the Personal Data needs to be erased for us to comply with a particular legal obligation.

5.6.2. Unless Middleton Asset Management has reasonable grounds to refuse to erase Personal Data, all requests for erasure shall be complied with and the Data Subject informed of the erasure within one month of receipt of the Data Subject's request. This can be extended by up to two months in the case of complex requests and, in such cases, the Data Subject shall be informed of the need for the extension within one month of receipt of the request. The decision to inform the Data Subject that there is a need for an extension to the period required to erase the Personal Data shall only be made by the HSE & Compliance Manager.

5.6.3. If any Personal Data that is to be erased in response to a Data Subject request has been disclosed to third parties those parties shall be informed of the erasure (unless it is impossible or would require disproportionate effort to do so).

5.7. The right to restrict processing



5.7.1. Data subjects may request that Middleton Asset Management ceases processing the Personal Data it holds about them. If a Data Subject makes such a request, we shall retain only the amount of Personal Data pertaining to that Data Subject that it is necessary to ensure that no further processing of their Personal Data takes place.

5.7.2. If any affected Personal Data has been disclosed to third parties those parties shall be informed of the applicable restrictions on processing it (unless it is impossible or would require disproportionate effort to do so).

5.8. The right to data portability

5.8.1. Where Data Subjects have given their consent to Middleton Asset Management to process their Personal Data in such a manner or the processing is otherwise required for the performance of a contract between Middleton Asset Management and the Data Subject, Data Subjects have the right to receive a copy of the Personal Data he or she has provided to Middleton Asset Management in a structured, commonly used and machine-readable format and to transmit it to other Data Controllers (e.g. other organisations).

5.8.2. In exercising this right to data portability, the Data Subject shall have the right to have the Personal Data transmitted directly from one Data Controller to another, where technically feasible.

5.8.3. All requests for copies of Personal Data for the purposes of data portability shall be complied with within one month of the Data Subject's request. This can be extended by up to two months in the case of complex requests or numerous requests and, in such cases, the Data Subject shall be informed of the need for the extension within one month of receipt of the request. The decision to inform the Data Subject that there is a need for an extension to the period required to provide copies of the Personal Data shall only be made by the HSE & Compliance Manager

5.9. The right to object

5.9.1. Data subjects have the right to object to Middleton Asset Management processing their personal if the processing is for:

- a task carried out in the public interest;
- the exercise of official authority vested in you; or
- your legitimate interests (including profiling) and direct marketing (including profiling).

5.9.2. Where a Data Subject objects to us processing their Personal Data based on its legitimate interests, Middleton Asset Management shall cease such processing forthwith, unless it can be demonstrated that our legitimate grounds for such processing override the Data Subject's interests, rights and freedoms; or the processing is necessary for the conduct of legal claims.



5.9.3. Where a Data Subject objects to Middleton Asset Management processing their Personal Data for direct marketing purposes, we shall cease such processing forthwith.

5.10. Rights with respect to automated decision-making and profiling

5.10.1. In the event that we use Personal Data for the purposes of automated decision-making and those decisions have a legal (or similarly significant effect) on Data Subjects, Data Subjects have the right to challenge such decisions, to request human intervention, to express their own point of view, and to obtain an explanation of the decision from Middleton Asset Management.

5.10.2. The right described immediately above does not apply in the following circumstances:

- the decision is necessary for the entry into, or performance of, a contract between Asset Remarketing Services and the Data Subject;
- the decision is authorised by law; or
- the Data Subject has given their explicit consent.

5.10.3. Where Middleton Asset Management uses Personal Data for 'profiling' purposes, the following shall apply:

- clear information explaining the profiling will be provided, including its significance and the likely consequences;
- appropriate mathematical or statistical procedures will be used;
- technical and organisational measures necessary to minimise the risk of errors and to enable such errors to be easily corrected shall be implemented; and
- all Personal Data processed for profiling purposes shall be secured in order to prevent discriminatory effects arising out of profiling.

5.10.4. 'Profiling' means any form of automated processing of Personal Data consisting of the use of Personal Data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.

6. Time Limit to Respond

6.1. In order to avoid any undue complications or confusion, Middleton Asset Management considers one month to mean 28 calendar days.

6.2. All requests will be managed by HSE & Compliance Manager, who will record the date on which the request was originally received. The 28 days will be deemed to have started on the date the request was originally received. If this is not possible because the following month is shorter (and there is no corresponding calendar date), the date for response is the last day of



the following month. If the corresponding date falls on a weekend or a public holiday, you have until the next working day to respond.

- 6.3. The UK GDPR and DPA 18 have a provision to extend the period for the response by a further two months (considered by Middleton Asset Management to be 56 days) if necessary, taking into account the complexity and the number of requests. It will be the responsibility HSE & Compliance Manager if such an extension is required together with the reasons for the delay. The requestor must also be notified of any delay no later than 28 days after the original request was received.

7. Implementation & Policy Management

- 7.1. This procedure shall be deemed effective as of 1st June 2022. No part of this procedure shall have retroactive effect and shall thus apply only to matters occurring on or after this date.
- 7.2. This procedure will be reviewed by the HSE & Compliance Manager and Data Protection Officer annually and following any Personal Data breach.



Schedule 1

Data Subject Rights Request Form Template

This form can be amended as appropriate with the authorisation of the Middleton Asset Management Data Protection Officer.

Middleton Asset Management Data Subject Rights Request Form

About this Form

This form is used by Middleton Asset Management to confirm the identity of the Data Subject (of a third party acting on behalf of the Data Subject) making a rights request and the nature of the rights to be exercised.

Once completed, please send this form and any attachments to HSE & Compliance Manager

Data Subject's Details

Please confirm your contacts details:

Title	
First Name	
Surname	
Address	
Telephone No.	
Email Address	

Identity Verification

Please provide us with further information to enable us to verify your identity. If you provide additional documents for this purpose, please only send copies to us and not originals:

Details of further information to enable us to verify your identity	
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Third Parties Acting for the Data Subject

If you are acting on behalf of a Data Subject, please confirm the nature of your relationship with the Data Subject and provide us with proof that you are entitled to act on behalf of the Data Subject. If you provide additional documents for this purpose, please only send copies to us and not originals Please also provide us with your contact details:

Details of your relationship with the	
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Data Subject and proof provided	
Your Title	
Your Surname	
Your Address	
Your Telephone No.	
Your Email Address	

Nature of Request

Please confirm the type of request you are making and provide us with any further information to help us facilitate your request:

Type of Request	<input type="checkbox"/> Subject access right request	<input type="checkbox"/> Right to rectification request	<input type="checkbox"/> Right to erasure request	<input type="checkbox"/> Right to restrict processing request
	<input type="checkbox"/> Right of portability request	<input type="checkbox"/> Right to object request	<input type="checkbox"/> Automated decision-making request	<input type="checkbox"/> Withdrawal of consent
Additional information related to your request				

Declaration

I confirm I am the Data Subject named above:

Signature	
Full Name	
Date	

OR

I confirm I am the third party named above and that I am entitled to act on behalf of the Data Subject named above:

Signature	
Full Name	

Version 1.0
Classification Public



Date	
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