

Realization of the rights of data subjects

The administrator has implemented procedures and principles facilitating the data subject's exercise of the right to personal data protection, including, in particular:

1. the right to withdraw consent to the processing of personal data provided (Article 7(3) of the GDPR),
2. the right to access personal data held by the data controller (Article 15 of the GDPR),
3. the right to rectify personal data (Article 16 of the GDPR),
4. the right to erasure of personal data, also known as the right to be forgotten (Article 17 of the GDPR),
5. the right to restriction of processing of personal data (Article 18 of the GDPR),
6. the right to data portability (Article 20 of the GDPR),
7. the right to oppose the processing of personal data (Article 21 of the GDPR),
8. the right to object to decisions based solely on automated processing of personal data (Article 22 of the GDPR).

I) Procedure for implementing the rights of data subjects.

II) Procedure for exercising rights.

III) Entities entitled to submit a request to implement the procedure for exercising rights.

Every individual whose data is processed may submit a request to the Administrator to exercise their data protection rights concerning their personal data. This applies specifically to the personal data of service recipients, system and application users, clients, contractors, employees, subcontractors, and service providers. Not only current service recipients, users, or employees have such entitlement. Regardless of the duration of collaboration with the Administrator, as long as we have your data, you may submit a request concerning your personal data. A particular category of individuals interested in submitting requests, such as limiting the processing of their personal data, are job candidates who have not been hired. Such individuals may request, for example, the deletion of their data from the recruitment database.

IV) Initiation of the procedure.

Each submission in the form of email, phone call, or letter containing a request regarding personal data of the individual in question is subject to review. The title and content of the request are irrelevant as long as they allow us to understand what the applicant is requesting regarding their personal data. If the content of the request is imprecise, incomplete, or lacks necessary information for initiating or continuing the procedure for exercising rights, the authorized individual is informed of the need to supplement, correct, or submit a new request, indicating the scope of necessary changes or additions to the data.



A request that does not contain sender's data or remains incomplete despite a reminder will not be considered. Such requests are recorded in the Query Register, indicating the reason for refusing their execution. At the same time, if possible, the authorized individual is notified of the above. The request can be resubmitted, subject to the same rules as the original request.

V) Initial verification of the application.

The person authorized to receive and process applications regarding personal data conducts an initial check of the submitted application and verifies whether:

1. The applicant's data,
2. The data of the person whose personal data are concerned,
3. Scope of the requested action from the Administrator,
4. Scope of personal data concerned,

and assesses:

1. the correctness of contact details
2. whether the requester or the person whose personal data is concerned is included in the Administrator's personal data set
3. the possibility for the applicant to submit a request on behalf of another person, e.g., a parent on behalf of minors
4. the scope of the request and the scope of data covered by the application - whether it is consistent with the scope of the personal data held and the request falls within the statutory catalogue of rights of the data subject

Next, the application is forwarded to the person responsible for GDPR handling for further processing, with an annotation and indication of the results of the preliminary review.

VI) The form and manner in which the authorized person submits the request/claim.

A1. In writing

The Administrator has prepared a request template for the Rights Implementation Procedure, which is included as an Annex to this document. This template is also available on the website www.labplus.pl/rodo, under the data management information templates. It's designed to simplify the process for those exercising their rights. However, individuals are not restricted to using this form and can submit their requests in other formats. Any paper submissions containing requests regarding personal data are processed accordingly.

A2. by e-mail

The request can be submitted via email by attaching the template available on the website www.labplus.pl/rodo, or in any other form



Adres: rodo@labplus.pl

Sending the request to other email addresses of the Administrator initiates the Rights Implementation Procedure. The request is forwarded promptly, according to responsibilities.

A3. Oral submission

The request can also be submitted orally, by phone. The person responsible for the Procedure for the exercise of rights, upon receiving the request, prepares a memo by obtaining information from the person making the request:

1. contact details of the person making the request.
2. data of the person whose data is concerned.
3. scope of the request.
4. scope of personal data..

To verify the identity of the person making the request and the person whose personal data is concerned, the contents confirmed by the oral (telephone) conversation are sent to the requester for approval via email. After the proper verification of the identities of the applicants, the request is further processed.

VII) Implementation of the request.

After the initial analysis of the request, the Data Protection Officer or an authorized employee proceeds with its implementation. The execution of the request is carried out in accordance with the applicant's demand, provided it complies with applicable legal regulations and does not contradict the purposes of personal data processing. For example, the execution of individuals' rights may lead to:

1. withdrawal of consent for processing personal data and cessation of processing of such personal data,
2. providing access, information about the personal data held by the Administrator,
3. rectifying personal data,
4. deleting personal data,
5. limiting the processing of personal data in accordance with the request,
6. transferring personal data, providing personal data in accordance with the request,
7. consideration/refusal of the objection with justification for refusal,
8. discontinuation of automatic personal data profiling.

If the request cannot be fulfilled according to the person's demand, the above is justified by providing information on possible ways to conclude the matter, further proceedings, the option to raise objections, the



possibility of appealing the decision of the person considering the application to the Administrator, and reporting to the supervisory authority.

The person submitting the request is notified in writing or by email about the method of implementing the application.

VIII) Deadlines, registers, fees

The receipt of the request (including incomplete ones or those not pursued further) is recorded in the inquiry register along with how it was handled. The request should be processed promptly, no later than within 30 (thirty) days from the date of its receipt. If necessary, this period can be extended by another two months due to the complex nature of the request or the number of requests. Within a month of receiving the request, the person whose data is concerned should be informed of such an extension, along with the reasons for the delay. Information and actions taken as part of the Right of Access Procedure are free of charge. However, if the requests from the data subject are evidently unjustified or excessive, especially due to their repetitive nature, the Administrator may:

- a) charges a reasonable fee, taking into account the administrative costs of providing the information, conducting the communication or taking the requested action, or
- b) refuse to act on the request. The Administrator has the burden of demonstrating that the request is manifestly unreasonable or excessive.

IX) Cancellation

A person who makes a request and is dissatisfied with the manner in which the request was implemented or denied may file an appeal with the Administrator within 14 (fourteen) days from the date of receipt of information on the manner in which the request was implemented in writing or by e-mail. The right to verbal appeal is excluded. The person concerned will be informed of the above in the course of the proceedings. The person shall also be informed of the possibility of submitting information to the supervisory authority with the indication of address data and with instructions on the rights of the data subjects. The administrator, within 14 (fourteen) days from the date of receipt of the appeal, will respond to it, and if he finds grounds for granting the request, he will forward the information to the GDPR specialist with his opinion. The GDPR specialist shall reconsider the request and, if his previous position is upheld, inform the Administrator and the applicant of the reasons for the decision. If the appeal is upheld, he will review the application, taking immediate action.

The appellant will be notified of the appeal decision.

