

Ecobat Data Subject Rights Policy & Procedure

ecobat

DATA SUBJECT RIGHTS FORM

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US Data Subject
Rights Policy

I. Introduction

Ecobat is a world leader in the production of lead, lead alloys, and the recycling of lead batteries. Our vast network features 11 smelters across two continents with an average annual output of 840,000 tons of lead. We also offer premium services such as in-depth consultancy on lead and metallurgy with the help of industry experts.

We process personal information about a variety of people, including customers, vendors and other stakeholders. Ecobat is also an employer, and we therefore process personal data about our employees and individuals who wish to work for us.

II. About this Policy

This policy relates to the obligations of Ecobat Holdings, Inc's US subsidiaries (together hereinafter referred to as "Ecobat"/ "We") as a Business in respect of Consumer rights as set out in various state legislations, including the California Consumer Privacy Act (CCPA), the California Privacy Rights Act (CPRA), and the Texas Data Privacy and Security Act (TDPSA). This can be, for instance, in respect of our employees' or customers' personal information.

III. Aims of the Policy

This policy sets out our commitment to:

- Acknowledge and respond to all consumer rights requests in a person-centered manner and according to our core values.
- Ensure that all personal information is processed fairly and lawfully and in accordance with your rights.
- Ensure that everyone working for Ecobat or on Ecobat's behalf complies with this Policy when dealing with consumer rights.
- Identify the approach that Ecobat will take when responding to requests, including setting out some of the exemptions that may apply when responding to requests.

IV. Scope

This Policy, which we may amend at any time, covers all employees, officers, consultants, contractors, interns, casual workers, and agency workers, and does not form part of any contract of employment. This Policy applies to all consumer rights requests that we receive.

V. Definitions

Consumer

An identified or Identifiable Natural Person as defined in each respective state legislative data privacy act.

Business

An entity that operates for profit in California and meets at least one of the following criteria: has an annual gross revenue over \$25 million; buys, sells, or shares personal information of 100,000 or more Consumers or households annually; or derives 50% or more of its annual revenues from selling or sharing Consumers' personal information. This also includes entities that control or are controlled by such businesses and share common branding, as well as joint ventures with significant business interests or defined in each respective state legislative data privacy act.

Third Party

Any person or entity that is not the business the Consumer interacts with, a service provider to that business, or a contractor.

Personal Information

Any information that identifies, relates to, or could reasonably be linked with a particular Consumer or household, excluding publicly available information, deidentified information, and aggregate Consumer information.

Sensitive Personal Information

Data such as social security numbers, account details with access credentials, precise geolocation, racial or ethnic origin, citizenship, religious beliefs, union membership, contents of mail and messages (unless intended for the business), genetic data, biometric information used for identification, health data, and information about sex life or sexual orientation. Publicly available sensitive information is not considered sensitive under certain state data privacy legislation.

Identifiable Natural Personal

Someone who can be recognized directly or indirectly through details such as their name, ID number, location, online ID, or unique physical, genetic, mental, economic, cultural or social traits.

Employees

Individuals who work for Ecobat in various capacities, whether permanently or temporarily. This includes officers, consultants, contractors, interns, casual workers and agency workers.

Communication or transfer of data

Any disclosure of data to a person other than the Consumer.

Consent

Clear, informed, and specific agreement by the Consumer or their legal representative to process personal information for a particular purpose, indicated by a clear affirmative action.

Processing

Any operation or set of operations performed on personal information or sets of personal information, whether by automated means or not.

Applicant

A person who has made a Consumer request.

VI. Privacy Legislation

California

[California Consumer Privacy Act \(CCPA\)](#)

[California Privacy Rights Act \(CPRA\)](#)

Colorado

[Colorado Privacy Act \(CPA\)](#)

Texas

[Texas Data Privacy and Security Act \(TDPSA\)](#)

VII. Roles and Responsibilities

The Chief Executive Officer (“CEO”) is responsible for ensuring compliance with this Policy and has delegated day-to-day responsibility for its execution to the Chief Commercial Officer (“CCO”) and Chief Human Resources Officer (“CHRO”). Duties and responsibilities of the CCO and CHRO include monitoring and reviewing the operation of the Policy, making recommendations for change to minimize risk, and reviewing the Policy annually to ensure it satisfies applicable legal requirements. The CCO and CHRO may delegate responsibilities to delegates as they may deem necessary or appropriate to assist the CCO and CHRO.

The Commercial and HR teams are responsible for managing all responses to consumer rights requests within organizational and statutory deadlines. The Commercial and HR teams can be contacted at support@ecobat.com or by calling 1-877-432-6228.

Ecobat will provide staff with appropriate training/guidance so that they are able to comply with their responsibilities under this Policy.

VIII. Contacts for Questions Regarding Policy Content or Application

Questions regarding the content or application of this Policy should be directed to the CCO or CHRO who can be contacted at: support@ecobat.com.

IX. Data Protection Rights

Certain state legislative acts provide Consumers with rights in respect of the use of their Personal Information. For example, CCPA and CPRA provide the following rights:

- Right to know
- Right to delete
- Right to opt-out of sale or sharing
- Right to non-discrimination
- Right to correct
- Right to limit

These rights aim to provide individuals with greater transparency and control over their Personal Information. Please note those rights are not absolute, and in some cases legal exemptions apply. Please reach out to support@ecobat.com for further guidance and clarification, if required.

X. Right to Know/Access

The right to know helps individuals understand how Ecobat has collected, used, and/or sold or shared their Personal Information over the preceding twelve (12) months, and to request access to the Personal Information that Ecobat holds concerning them.

Individuals can request the following information from Ecobat:

- Categories of Personal Information collected.
- Specific pieces of Personal Information collected.
- Categories of sources from which Ecobat collected Personal Information.
- Purposes for which Ecobat uses the Personal Information.
- Categories of third parties with whom Ecobat shares the Personal Information.
- Categories of information that Ecobat sells or discloses to third parties.

We will provide information in response to requests without undue delay and at the latest within forty-five (45) calendar days of receipt. However, we may extend the period of compliance by a further forty-five (45) calendar days when requests are complex or numerous. In this case, we will inform the individual within one month of receipt of the request(s) and explain why the extension is necessary.

We will provide the requested Personal Information free of charge, however, if the request is manifestly unfounded, excessive, or repetitive within the same 12-month period, Ecobat may charge a reasonable fee based on administrative costs.

To ensure the request reaches the correct team individuals are encouraged to submit it via the Subject Access Request Form on our website where they can set out the specific details of the request. Using this form to submit a request is not mandatory, however it will help us ensure the requests are dealt with efficiently and in a consistent manner, especially in terms of recording requests and responding to them. Alternatively, individuals can call us via our toll-free number: 1-877-432-6228 or email us at support@ecobat.com.

We will always consider the most appropriate format to disclose the information based on your request.

On some occasions, for instance, where the individual requests large amounts of data, we may require more information to help us meet that request. Where this is the case individuals will be informed as soon as possible that more information is required. The period for responding to the request will begin when any additional information is received. If an individual refuses to provide additional information, we will still endeavor to comply with their request by making reasonable searches for the information covered by the request.

Ecobat does not intend to collect Personal Information relating to children unless required for benefits coverage or beneficiary information. Children can also make subject access requests where we happen to process their Personal Information. Before responding to a subject access request for information held about a child, the CHRO will consider whether the child is mature enough to understand their rights, taking into account a number of considerations. If so, then the response will be made directly to the child. Parents may also be allowed to exercise the child's rights on their behalf if the child authorizes this, or if it is evident that this is in the best interests of the child.

In some circumstances, we may refuse to respond to a request. This can be the case if:

- Ecobat cannot verify the request.
- The request is manifestly unfounded or excessive, or Ecobat has already provided Personal Information to the Consumer more than twice in a twelve (12) month period.

- Ecobat cannot disclose certain sensitive information, such as social security number, financial account number, or account passwords, but will tell if we are collecting that type of information.
- Disclosure would restrict Ecobat's ability to comply with legal obligations, exercise legal claims or rights, or defend legal claims.
- If the Personal Information is certain medical information, Consumer credit reporting information, or other types of information exempt from certain state legislative privacy acts such as the CCPA.

Where we refuse to provide all information responsive to the request, we will explain the reason to the individual (including the exemption if this applies).

XI. Right to Delete

Individuals have the right to request that Ecobat delete their Personal Information.

We will respond to requests without undue delay and at the latest within forty-five (45) calendar days of receipt. However, we may extend the period of compliance by a further forty-five (45) calendar days when requests are complex or numerous. In this case, we will inform the individual within one month of receipt of the request(s) and explain why the extension is necessary.

Ecobat is required to verify that the individual making a request to delete is the Consumer about whom Ecobat has Personal Information. Therefore, Ecobat may need to ask you for additional information for verification purposes. If Ecobat asks for Personal Information to verify your identity, such information will only be used for verification purposes.

We can refuse to comply with a request for deletion:

- If the information is exempt from certain state legislative privacy acts which includes:
- Publicly available information (such as your address, which is often in public real estate/property records). However, if you are a law enforcement officer, public official, or Safe at Home participant (available to victims of domestic violence, stalking, sexual assault, human trafficking, elder and dependent abuse, as well as reproductive health workers), you may request Ecobat to not publicly post your address.
- Certain types of information such as medical information or consumer credit reporting information.
- If Ecobat cannot verify your request
- To complete your transaction, provide a reasonably anticipated product or service, or for certain warranty and product recall purposes

- For certain business security practices
- For certain internal uses that are compatible with reasonable consumer expectations or the context in which the information was provided
- To comply with legal obligations, exercise legal claims or rights, or defend legal claims
- If Personal Information is certain medical information, consumer credit reporting information, or other types of information exempt from state specific legislative acts

XII. Right to Opt-out of Sale or Sharing

Individuals have the right to request that Ecobat stop selling or sharing their Personal Information. Sharing refers specifically to cross-context behavioral advertising, which is the targeted advertising of Consumer's Personal Information obtained from online activity across numerous websites.

Ecobat will not sell or share Consumers' Personal Information after it receives opt-out requests, unless:

- The Consumer's authorization was provided allowing Ecobat to do so again.
- Sale or sharing is necessary for Ecobat to comply with legal obligations, exercise legal claims or rights, or defend legal claims.
- The information is publicly available information, certain medical information, consumer credit reporting information, or other types of information exempt from the CCPA or similar state data privacy legislation.

Ecobat will respond to all requests as soon as possible, up to a maximum of fifteen (15) business days from the receiving date of request to opt-out. Ecobat will however wait at least twelve (12) months before asking Consumers to opt back in to the sale or sharing of Personal Information.

While Ecobat not required to verify that the person submitting an opt-out request is really the Consumer for whom the business has Personal Information, we may need to ask you for additional information to make sure we stop selling the right person's Personal Information. If we ask for Personal Information to verify your identity, we will only use such information for verification purposes.

We can refuse to comply with a request to opt-out if:

- Sale or sharing is necessary for Ecobat to comply with legal obligations, exercise legal claims or rights, or defend legal claims.
- The information is publicly available information, certain medical information, consumer credit reporting information, or other types of information exempt from the CCPA or other similar state data privacy laws.

XIII. Right to Non-Discrimination

Individuals have the right not to be subjected to discriminatory practices. Ecobat therefore will not deny goods or services, charge you a different price, or provide a different level or quality of goods or services to you just because you exercised your rights under certain state legislative data privacy acts.

However, if you refuse to provide your Personal Information to Ecobat or ask us to delete or stop selling your Personal Information, and that Personal Information or sale is necessary for Ecobat to provide you with goods or services, we may not be able to complete that transaction.

XIV. Right to Correct

Individuals also have the right to ask Ecobat to correct inaccurate information that we have about them.

We will provide a response to requests for correction without undue delay and at the latest within forty-five (45) calendar days of receipt. However, we may extend the period of compliance by a further forty-five (45) calendar days when requests are complex or numerous. In this case, we will inform the individual within one month of receipt of the request(s) and explain why the extension is necessary.

To ensure the request reaches the correct team individuals are encouraged to submit it via the correction request form on our website where they can set out the specific details of the request. Using this form to submit a request is not mandatory, however it will help us ensure the requests are dealt with efficiently and in a consistent manner, especially in terms of recording requests and responding to them. Alternatively, individuals can call us via our toll-free number: 1-877-432-6228 or email us at support@ecobat.com.

We can refuse to comply with a request to correct if:

- Ecobat cannot verify your identity to complete your request
- The request is manifestly unfounded or excessive
- The information is publicly available information, certain medical information, consumer credit reporting information, or other types of information exempt from state legislative data privacy acts.

XV. Right to Limit

Consumers have the right to limit the use and disclosure of their Sensitive Personal Information (SPI) in certain circumstances. If this right is exercised, an individual can direct Ecobat to only use their SPI (for example, social security number, financial account information, precise geolocation data, or genetic data) for limited purposes, such as providing them with specifically requested services.

XVI. Exemptions

In some instances, exceptions may apply, meaning we cannot fulfil an individual's request. Exemptions will usually have a basis in law. Please contact the Commercial or HR Departments if you would like to find out some more information on an applicable exemption.

XVII. Charging a Fee

In some circumstances, we may charge a "reasonable fee" for the administrative costs of complying with a request if it is manifestly unfounded or excessive. "Reasonable fee" will be based on the administrative costs of complying with the request. For instance, where an individual makes a request, we may charge them a further fee if they request additional copies of the data provided to them following their initial request.

XVIII. Verifying Identity

We may require additional information from an applicant to verify their identity. We will let the individuals know as soon as possible if more information is required so that we can respond to their request.

XIX. Timeframe for Responding to your Request

With the exception of you exercising the right to opt out of the sale or sharing of your personal information will respond to any request without undue delay and at the latest within forty-five (45) calendar days of receipt. However, we may extend the period of compliance by a further forty-five (45) calendar days when requests are complex or numerous. In this case, we will inform the individual within one month of receipt of the request(s) and explain why the extension is necessary.

XX. Policy Updates

With the exception of you exercising the right to opt out of the sale or sharing of your personal information, Ecobat will respond to any request without undue delay and at the latest within forty-five (45) calendar days of receipt. However, we may extend the period of compliance by a further forty-five (45) calendar days when requests are complex or numerous. In this case, we will inform the individual within one month of receipt of the request(s) and explain why the extension is necessary.

XXI. Related Policies and Processes

This policy should be read in conjunction with the following policies and processes:

- Ecobat Data Subject Rights Procedure



US Data Subject
Rights Procedure

Purpose of Document

This document outlines the procedures and guidelines adopted by Ecobat for the effective management of requests from Consumers exercising their rights under the California Consumer Privacy Act (CCPA), the California Privacy Rights Act (CPRA), the Texas Data Privacy and Security Act (TDPSA) or other similar state data privacy legislation. The purpose of this procedure is to ensure that Ecobat handles such requests consistently, efficiently, and in compliance with its legal obligations.

Specifically, this procedure aims to:

- Affirm Ecobat’s commitment to privacy and data protection
- Define clear guidelines for processing Consumer rights requests
- Ensure compliance with applicable data protection laws
- Promote transparency and accountability
- Train and inform employees generally on how to handle such requests

Scope

This document applies to all Consumer rights requests received by Ecobat from data subjects in the United States.

Definitions

Consumer

An identified or Identifiable Natural Person as defined in each respective state legislative act.

Business

An entity that operates for profit in California and meets at least one of the following criteria: has annual gross revenues over \$25 million, buys, sells, or shares personal information of 100,000 or more consumers or households annually, or derives 50% or more of its annual revenues from selling or sharing consumers’ personal information. This also includes entities that control or are controlled by such businesses and share common branding, as well as joint ventures with significant business interests or as defined in each respective state legislative data privacy act.

Third Party

Any person or entity that is not the business the consumer interacts with, a service provider to that business, or a contractor.

Personal Information

Any information that identifies, relates to, or could reasonably be linked with a particular consumer or household, excluding publicly available information, deidentified information, and aggregate consumer information.

Sensitive Personal Information

Data such as social security numbers, account details with access credentials, precise geolocation, racial or ethnic origin, citizenship, religious beliefs, union membership, contents of mail and messages (unless intended for the business), genetic data, biometric information used for identification, health data, and information about sex life or sexual orientation. Publicly available sensitive information is not considered sensitive under certain state data privacy legislation.

Identifiable Natural Personal

Someone who can be recognized directly or indirectly through details such as their name, ID number, location, online ID, or unique physical, genetic, mental, economic, cultural, or social traits.

Employees

Individuals who work for Ecobat in various capacities, whether permanently or temporarily. This includes officers, consultants, contractors, volunteers, interns, casual workers, and agency workers.

Privacy Legislation

[California Consumer Privacy Act \(CCPA\)](#)

[California Privacy Rights Act \(CPRA\)](#)

[Texas Data Privacy and Security Act \(TDPSA\)](#)

Communication or transfer of data

Any disclosure of data to a person other than the Consumer.

Consent

Clear, informed, and specific agreement by the Consumer or their legal representative to process Personal Information for a particular purpose, indicated by a clear affirmative action.

Processing

Any operation or set of operations performed on Personal Information or sets of Personal Information, whether by automated means or not.

Applicant

A person who has made a Consumer request.

Roles and Responsibilities

The Chief Executive Officer (“CEO”) is responsible for ensuring compliance with this document and has delegated day-to-day responsibility for its execution to the Chief Commercial Officer (“CCO”) and Chief Human Resources Officer (CHRO”). Duties and responsibilities of the CCO and CHRO include monitoring and reviewing the operation of the document, making recommendations for change to minimize risk, and reviewing the document annually to ensure it satisfies applicable legal requirements and is practically suitable for the business. The CCO and CHRO may delegate responsibilities to delegates as they may deem necessary or appropriate to assist the CCO and CHRO.

The Data Requests team is responsible for managing all responses to Consumer rights requests within organizational and statutory deadlines. When a Consumer rights request is received by Ecobat, it is the responsibility of the Data Request team to validate the request and provide an initial response. As many Consumer right requests are subject to statutory time limits, it is important that these reach the Data Request team as soon as possible after receipt.

The Data Request team is responsible for ensuring requests are forwarded to the relevant Ecobat function(s) in a timely manner and engaging with them to ensure that any queries about the requests are dealt with promptly.

In the case of Consumers exercising their right to know, the Data Request team is also responsible for assessing the requested information, determining the applicability of exemptions, and where necessary preparing it for disclosure. The CEO is ultimately accountable for the responsibilities of the Data Request team.

Employees are responsible for:

- Identifying Consumer rights requests
- Referring Consumer rights requests immediately to the Data Requests team: support@ecobat.com.
- Co-operating with and assisting the Data Requests team to coordinate responses to requests.

A. PROCESS

This process document outlines the steps and procedures Ecobat follows in managing the following specific rights granted to data subjects under the Privacy Legislation concerning the processing of their Personal Information.

- Right to know
- Right to delete
- Right to opt-out of sale or sharing
- Right to non-discrimination
- Right to correct
- Right to limit

Ecobat has separate procedures for each of the Consumer rights.

I. Right to Know/Access

Certain state privacy legislation gives Consumers the right to understand how Ecobat has collected, used, and/or sold or shared their Personal Information over the preceding twelve (12) months, and to request access to the Personal Information that Ecobat holds concerning them.

Individuals can request the following information from Ecobat:

- Categories of Personal Information collected.
- Specific pieces of Personal Information collected.
- Categories of sources from which Ecobat collected Personal Information.
- Purposes for which Ecobat uses the Personal Information.
- Categories of third parties with whom Ecobat shares the Personal Information.
- Categories of information that Ecobat sells or discloses to third parties.

A. PROCEDURE

Step 1: Receipt of Right to Know/Access Request

Upon receipt of a Right to Know/Access request, the Data Requests team:

- Logs the request in a tracking system and documents the details of the request.
- Verifies the identity of the requestor to ensure they are the data subject or a legally authorized representative. If additional information is required for verification, request it promptly.

Step 2: Identification and Collection of Data

Following verification of the Applicant's identity, the Data Requests team will:

- Inform all relevant employees who might hold data concerning the Consumer about the request.
- Collect all relevant Personal Information, including details of:
 - Categories of Personal Information collected.
 - Specific pieces of Personal Information collected.
 - Categories of sources from which Personal Information was collected.
 - Purposes for which Personal Information is used.
 - Categories of third parties with whom Personal Information is shared.
 - Categories of information sold or disclosed to third parties.

Step 3: Assessment and Preparation of Response

The Data Requests team will:

- Determine if the request can be fulfilled within the standard forty-five (45) calendar days or if an extension of up to forty-five (45) additional days is needed due to complexity or volume and inform the applicant within one month if an extension is required.
- Review collected data for completeness and relevance. Apply necessary redactions to protect third-party information and remove duplicates.
- Exclude sensitive Personal Information such as social security numbers, financial account numbers, or account passwords and notify the applicant if such data is collected but not disclosed.

Step 4: Response to the Individual

Ecobat will:

- Provide the requested information in the most appropriate format based on the Applicant's request (e.g., electronic format, Braille, audio).
- Issue the response without undue delay, within forty-five (45) calendar days, or within the extended period if applicable.

Step 5: Handling Fees and Repeat Requests

Ecobat will always provide the initial copy of requested Personal Information free of charge. However, for repeat or excessive requests, the Data Requests team will charge a reasonable fee.

- Advise the Applicant on the applicable charge of a reasonable fee based on administrative costs for meeting such requests within the same 12-month period.
- If refusing to comply with a request, document the reason and inform the Applicant.

Step 6: Record Keeping and Compliance

Ecobat will:

- Keep records of all Right to Know/Access requests received, and responses provided to track repeat requests and ensure compliance.
- Verify that any reasons for any refusal to provide information is well documented and appropriately communicated to the Applicant.

II. Right to Delete

Certain state privacy legislation gives consumers the right to request Ecobat to delete their Personal Information.

A. PROCEDURE

Step 1: Receipt of Right to Delete Request

Upon receipt of a Right to Delete request, the Data Requests team:

- Logs the request into a tracking system and documents the details of the request.
- Verifies the identity of the applicant to ensure they are the data subject or a legally authorized representative. If additional information is required for verification, request it promptly.

Step 2: Assessment and Initial Response

The Data Requests team will:

- Assess the request to determine if it can be fulfilled within the standard forty-five (45) calendar days or if an extension of up to forty-five (45) additional days is needed due to complexity or volume and inform the applicant within one month if an extension is required, explaining the need for additional time.

- Determine if the requested deletion is permissible under the applicable state data privacy legislative acts. Certain types of information are exempt from deletion requests, including:
 - Publicly available information.
 - Medical information.
 - Consumer credit reporting information.
 - Information required to complete a transaction, provide a product or service, or for warranty and recall purposes.
 - Information needed for certain business security practices or internal uses compatible with consumer expectations.
 - Information needed to comply with legal obligations, exercise legal claims or rights, or defend legal claims.

Step 3: Deletion Process

The Data Requests team will:

- Assess the request to determine if it can be fulfilled within the standard forty-five (45) calendar days or if an extension of up to forty-five (45) additional days is needed due to complexity or volume and inform the applicant within one month if an extension is required, explaining the need for additional time.
- Determine if the requested deletion is permissible under the state data privacy legislative acts. Certain types of information are exempt from deletion requests, including:
 - Publicly available information.
 - Medical information.
 - Consumer credit reporting information.
 - Information required to complete a transaction, provide a product or service, or for warranty and recall purposes.
 - Information needed for certain business security practices or internal uses compatible with consumer expectations.
 - Information needed to comply with legal obligations, exercise legal claims or rights, or defend legal claims.

Step 4: Response to the Individual

Ecobat will:

- Provide a response to the applicant without undue delay, confirming the deletion of their Personal Information. Include information on any data that was not deleted due to exemptions and the reasons for refusal.
- Issue the response within forty-five (45) calendar days of receipt of the request, or within the extended period if applicable.

Step 5: Handling Fees and Repeat Requests

Ecobat will always process the initial deletion request free of charge. However, for repeat or excessive requests, the Data Requests team will:

- Advise the applicant on the applicable charge of a reasonable fee based on administrative costs for meeting such requests within the same 12-month period.
- If refusing to comply with a request, document the reason and inform the applicant.

Step 6: Record Keeping and Compliance

Ecobat will:

- Keep records of all Right to Delete requests received and responses provided to track repeat requests and ensure compliance.
- Verify that any reasons for any refusal to provide information is well documented and appropriately communicated to the applicant.

III. Right to Opt-out of Sale of Sharing

Under certain state data privacy legislative acts, Consumers have the right to request that Ecobat stop selling or sharing their Personal Information. Sharing refers specifically to cross-context behavioral advertising, which is the targeted advertising of Consumer's Personal Information obtained from online activity across numerous websites.

A. PROCEDURE

Step 1: Receipt of Right to Opt-Out Request

- Upon receipt of a Right to Opt-Out request, the Data Requests team logs the request in a tracking system and documents the details of the request.
- While not required to verify the identity of the person submitting the opt-out request, Ecobat may ask for additional information to ensure we stop selling or sharing the correct individual's Personal Information. Information obtained for verification purposes will only be used for this purpose.

Step 2: Assessment and Initial Response

The Data Requests team will:

- Assess the request to determine if it can be fulfilled within the standard fifteen (15) business days. If additional information is required, request it promptly.
- Determine if the requested opt-out is permissible under the appropriate state privacy legislative act CCPA. Certain types of information are exempt from opt-out requests, including:
 - Publicly available information.
 - Medical information.
 - Consumer credit reporting information.
 - Information required to comply with legal obligations, exercise legal claims or rights, or defend legal claims.

Step 3: Implementation of Opt-Out

The Data Requests team will:

- Identify all instances of the Consumer's Personal Information that is being sold or shared.
- Ensure that all sales or sharing of the identified Personal Information cease immediately upon processing the opt-out request.
- If Personal Information has been shared with third parties, notify them of the opt-out request and instruct them to stop using the data for any cross-context behavioral advertising.

Step 4: Response to the Individual

Ecobat will:

- Provide a response to the applicant as soon as possible, confirming that their Personal Information is no longer being sold or shared.
- Issue the response within fifteen (15) business days of receipt of the request.

Step 5: Handling Fees and Repeat Requests

- Ecobat will always process opt-out requests free of charge.
- Ecobat will wait at least twelve (12) months before asking Consumers to opt back into the sale or sharing of their Personal Information.

Step 6: Record Keeping and Compliance

Ecobat will:

- Keep records of all Opt-Out requests received and responses provided to track repeat requests and ensure compliance.
- Verify that any reasons for any refusal to provide information are well documented and appropriately communicated to the applicant.

IV. Right to Non-Discrimination

Some state data privacy legislation acts provide Consumers with the right not to be subjected to discriminatory practices. Ecobat therefore will not deny goods or services, charge Consumers a different price, or provide a different level or quality of goods or services to Consumers just because they exercised their rights.

A. PROCEDURE

To give effect to this right, Ecobat will take the following steps:

- Ensure that all Employees are regularly trained on the non-discrimination requirements of the state data privacy legislative act.
- Ensure that all Consumer rights requests under the state data privacy legislative act (e.g., Right to Know, Right to Delete, Right to Opt-Out) are handled in a manner that does not result in discriminatory practices.
 - Implement a verification process to ensure that any differential treatment is based on legitimate business needs and not as a result of exercising state privacy legislative act rights.
 - If a Consumer refuses to provide Personal Information necessary for the provision of goods or services, or requests deletion or opt-out, inform the Consumer that such refusal may prevent Ecobat from completing the transaction. Document such instances to ensure compliance and transparency.
 - Clearly communicate to the Consumer if their request will impact their ability to participate in a transaction or receive a service, including the reasons why Personal Information is necessary.
 - If Ecobat offer promotions, discounts, and other deals in exchange for collecting or retaining Personal Information, it will ensure that the financial incentive is reasonably related to the value of the Personal Information, the terms of the financial incentive are clearly explained to the Consumer and Consumers are informed of their right to withdraw from the financial incentive at any time.

- Keep records of all interactions related to non-discrimination compliance, including instances where Personal Information was necessary for a transaction or where financial incentives were offered.
- Conduct regular audits to ensure compliance with non-discrimination policies and to identify any areas for improvement.
- Provide Consumers with clear contact information to address any questions or concerns regarding how their requests under the state privacy legislative act may impact their participation in promotions, discounts, or other deals.

V. Right to Correct

Some state privacy legislative acts give individuals the right to ask Ecobat to correct inaccurate information that we have about them.

A. PROCEDURE

Step 1: Receipt of Right to Correct Request

Upon receipt of a Right to Correct request, the Data Requests team:

- Logs the request in a tracking system and documents the details of the request.
- Verifies the identity of the applicant to ensure they are the data subject or a legally authorized representative.
- If additional information is required for verification, request it promptly. Information obtained for verification purposes will only be used for this purpose.

Step 2: Assessment and Initial Response

The Data Requests team will:

- Assess the request to determine if it can be fulfilled within the standard forty-five (45) calendar days or if an extension of up to forty-five (45) additional days is needed due to complexity or volume. Inform the individual within one month if an extension is required, explaining the need for additional time.
- Determine if the requested correction is permissible under the state data privacy legislative acts. Certain types of information are exempt from correction requests, including:
 - Publicly available information.
 - Medical information.
 - Consumer credit reporting information.

Step 3: Implementation of Correction

Ecobat will:

- Identify all instances of the Consumer's Personal Information that need correction.
- Correct the identified Personal Information in all records, databases, and systems. Ensure that any backups or archived versions are also updated, where feasible.
- If Personal Information has been shared with third parties, notify them of the correction request and instruct them to update the data as well.

Step 4: Response to the Individual

Ecobat will:

- Provide a response to the individual without undue delay, confirming the correction of their Personal Information.
- Notify the Applicant of any data not corrected due to exemptions and reasons for refusal.
- Issue the response within forty-five (45) calendar days of receipt of the request, or within the extended period if applicable.

Step 5: Handling Fees and Repeat Requests

Ecobat will always process the initial correction request free of charge. However, for repeat or excessive requests, the Data Requests team will:

- Advise the applicant on the applicable charge of a reasonable fee based on administrative costs for meeting such requests within the same 12-month period.
- If refusing to comply with a request, document the reason and inform the applicant.

Step 6: Record Keeping and Compliance

Ecobat will:

- Keep records of all Right to Correct requests received and responses provided to track repeat requests and ensure compliance.
- Verify that any reasons for any refusal to provide information is well documented and appropriately communicated to the applicant.

VI. Right to Limit

Certain state privacy legislative acts give individuals the right to limit the use and disclosure of their Sensitive Personal Information. Where this right is exercised, Ecobat can only use the individual's Sensitive Personal Information for limited purposes, such as providing them with specifically requested services. Some state acts require Ecobat to embed a "Limit the Use of My Sensitive Personal Information" link within the header or footer of the business' webpage for easy access to Consumers. Selecting that link can either have the immediate effect of limiting the processing of the individual's Personal Information or provide them with more information as to how they can exercise this right.

A. EXEMPTIONS

Ecobat is not required to grant Consumers the Right to Limit or notify them of the same if it uses or discloses Sensitive Personal Information:

- To perform the services or provide the goods reasonably expected by an average Consumer who requests those goods or services.
- To prevent, detect and investigate security incidents that compromise the availability, authenticity, integrity or confidentiality of stored or transmitted Personal Information.
- To resist malicious, deceptive, fraudulent, or illegal actions directed at the business and to prosecute those responsible for those actions.
- To ensure the physical safety of natural persons.
- For short-term, transient use, including but not limited to, non-personalized advertising shown as part of a Consumer's current interaction with the business, provided that the Personal Information is not disclosed to another third party and is not used to build a profile about the Consumer or otherwise alter the Consumer's experience outside the current interaction with the business.
- To perform services on behalf of the business.
- To verify or maintain the quality or safety of a product, service or device that is owned, manufactured, manufactured for, or controlled by the business, and to improve, upgrade, or enhance the service or device that is owned, manufactured by, manufactured for or controlled by the business.
- To collect or process Sensitive Personal Information where the collection or processing is not for the purpose of inferring characteristics about a Consumer.

These exemptions noted above are set out in s7027(m) of the CCPA.

B. PROCEDURE

Step 1: Receipt of Right to Limit Request

Upon receipt of a Right to Limit request, the Data Requests team

- Logs the request in a tracking system and documents the details of the request.
- Verifies the identity of the applicant to ensure they are the data subject or a legally authorized representative. If additional information is required for verification, request it promptly. Information obtained for verification purposes will only be used for this purpose.

Step 2: Assessment and Initial Response

The Data Requests team will:

- Determine if the requested limitation is permissible under state privacy legislative acts. Ecobat does not have to honor the request if it is in respect of an exemption listed above.
- Cease using and disclosing the Consumer's Sensitive Personal Information no later than 15 business days from the date Ecobat receives the request.

Step 3: Implementation of Limitation

Ecobat will:

- Identify all instances of the consumer's Sensitive Personal Information that need to be limited in use and disclosure.
- Imminently notify all third parties to whom Ecobat has disclosed the Sensitive Personal Information that the Consumer has submitted a request to limit the use of that data and the third parties must comply with that request within the same timeframe. Ecobat must do this before Ecobat complies with the request.
- Implement the limitation on the identified Sensitive Personal Information across all records, databases, and systems. Ensure that any backups or archived versions are also updated, where feasible.

Step 4: Response to the Individual

Ecobat will:

- Provide a response to the Applicant without undue delay, confirming the limitation of their Sensitive Personal Information. Ecobat can also present the Applicant with a choice, allowing for specific uses of their Sensitive Personal Information as long as a single option to limit the use of their Personal Information is also offered.

- Notify the Applicant of any data that was not limited due to exemptions and the reasons for refusal.
- Issue the response within 15 business days of receipt of the request.

Step 5: Handling Fees and Repeat Requests

Ecobat will always process the initial limitation request free of charge. However, for repeat or excessive requests, the Data Requests team will

- Advise the Applicant on the applicable charge of a reasonable fee based on administrative costs for meeting such requests within the same 12-month period.
- If refusing to comply with a request, document the reason and inform the Applicant.

Ecobat will wait at least twelve (12) months from the date of the Applicant’s request before asking the Applicant to consent to the use or disclosure of their Sensitive Personal Information for purposes other than those set out in s7027(m) of the CCPA.

Step 6: Record Keeping and Compliance

Ecobat will:

- Keep records of all Right to Limit requests received and responses provided to track repeat requests and ensure compliance.
- Verify that any reasons for any refusal to provide information is well documented and appropriately communicated to the Applicant.

Contact Information

To submit a Consumer right request, Consumers can:

- Complete Ecobat’s Data Subject Access Request Form
- Call our toll-free number: 1-877-432-6228
- Email us at support@ecobat.com

Contact list for queries related to this procedure

Role	Name	Phone	Email

EU/UK Data Subject
Rights Policy

I. Introduction

Ecobat is a world leader in the production of lead, lead alloys, and the recycling of lead batteries. Our vast network features 11 smelters across two continents with an average annual output of 840,000 tons of lead. We also offer premium services such as in-depth consultancy on lead and metallurgy with the help of industry experts.

We process personal data about a variety of people, including customers, vendors and other stakeholders. Ecobat is also an employer, and we therefore process personal data about our employees and individuals who wish to work for us.

II. About this Policy

This policy relates to the obligations of Ecobat Holdings, Inc's EU and UK subsidiaries (together hereinafter referred to as "Ecobat"/ "We") in respect of data subject rights as set out under in the EU General Data Protection Regulation (GDPR), the UK General Data Protection Regulation (UK GDPR) and the UK's Data Protection Act 2018 (DPA) in the circumstances where Ecobat acts as a Data Controller and/or Data Processor. This can be, for instance, in respect of our employees' or customers' personal data.

III. Aims of the Policy

This policy sets out our commitment to:

- Acknowledge and respond to all data subject rights requests in a person-centered manner and according to our core values.
- Ensure that all personal data is processed fairly and lawfully and in accordance with your rights.
- Ensure that everyone working for Ecobat or on Ecobat's behalf complies with this policy when dealing with data subject rights.
- Identify the approach that Ecobat will take when responding to requests, including setting out some of the exemptions that might apply when responding to requests.

IV. Scope

This policy, which we may amend at any time, covers all employees, officers, consultants, contractors, interns, casual workers, and agency workers, and does not form part of any contract of employment. This policy applies to all data subject rights requests that we receive.

V. Definitions

Data Subject

An identified or identifiable natural person.

Data Controller

A person or organisation that decides, alone or jointly with others, why and how personal data is processed.

Data Processor

A person or organisation that processes personal data on behalf of the Data Controller.

Personal Data

Any information relating to an identified or identifiable natural person.

Identifiable Natural Personal

Someone who can be recognized directly or indirectly through details such as their name, ID number, location, online ID, or unique physical, genetic, mental, economic, cultural, or social traits.

Employees

Individuals who work for Ecobat in various capacities, whether permanently or temporarily. This includes officers, consultants, contractors, interns, casual workers, and agency workers.

VI. Privacy Legislation

United Kingdom

Data Protection Act 2018 (DPA 2018)

United Kingdom General Data Protection Regulation (UK GDPR)

Europe Union

General Data Protection Regulation (EU GDPR)

For the purpose of this policy, the UK GDPR and EU GDPR will collectively be referred to as the GDPR.

VII. Roles and Responsibilities

7.1 The Chief Executive Officer ("CEO") is responsible for ensuring compliance with this policy and has delegated day-to-day responsibility for its execution to the Chief Commercial Officer ("CCO") and Chief Human Resources Officer ("CHRO"). Duties and responsibilities of the CCO and CHRO include monitoring and reviewing the operation of the policy, making recommendations for change to minimize risk, and

reviewing the policy annually to ensure the policy satisfies applicable legal requirements. The CCO and CHRO may delegate responsibilities to delegates as they may deem necessary or appropriate to assist the CCO and CHRO.

7.2 The HR and Commercial teams are responsible for managing all responses to data subject rights requests within organisational and statutory deadlines.

7.3 Data subject requests can be sent to anyone within Ecobat. As such all staff are responsible for:

- Identifying data subject rights requests
- Referring data subject rights requests immediately to the Commercial or HR teams which can be contacted at support@ecobat.com.
- Co-operating with and assisting the Commercial or HR teams to coordinate responses to requests where required to do so.

7.4 Ecobat will provide staff with appropriate training/guidance so that they are able to comply with their responsibilities under this policy.

VIII. Contacts for Questions Regarding Policy Content or Application

Questions regarding the content or application of this policy should be directed to the CCO or CHRO who can be contacted at: support@ecobat.com.

IX. Data Protection Rights

9.1 GDPR provides individuals with the following rights in respect of the use of their personal data:

- Right of Access.
- Right to Rectification.
- Right to Erasure.
- Right to Restriction of Processing.
- Right to Data Portability.
- Right to Object to Processing; and
- The right not to be subject to automated decision processing where such a decision produces a legal or similarly significant effect on the individual.

9.2 These rights aim to provide individuals with greater transparency and control over their personal data. Please note those rights are not absolute, and in some cases legal exemptions apply. Please reach out to support@ecobat.com for further guidance and clarification, if required.

X. Right to Access

10.1 Exercise of this right is commonly referred to as a data subject access request (DSAR). The right of access helps individuals understand how and why organisations use their personal data, and to check it is being processed lawfully.

10.2 Individuals can request the following information from Ecobat:

- Confirmation that data concerning them is being processed;
- Access to that data; and
- Other supplementary information – this largely corresponds to the information provided in a privacy notice including:
 - The purposes for processing your personal data;
 - The categories of personal data being processed;
 - The recipients or categories of recipient of personal data;
 - How long we retain personal data or, where this is not possible, the criteria for determining how long it will be stored;
 - The existence of the right to request rectification, erasure or restriction of their personal data or to object to such processing;
 - The right to lodge a complaint with the UK's Information Commissioner's Office ('ICO') or another supervisory authority;
 - Information about the source of their data where it was not obtained directly from you;
 - The existence of automated decision-making (including profiling); and
 - The safeguards to protect personal data if it is transferred to a third country or international organization.

10.3 We will provide information in response to DSARs without undue delay and at the latest within one month of receipt. However, we may extend the period of compliance by a further two months where requests are complex or numerous. In this case, we will inform the individual within one month of the receipt of the request(s) and explain why the extension is necessary.

10.4 To ensure the request reaches the correct team individuals are encouraged to submit it via the subject access request form on our website where they can set out the specific details of the request. Using this form to submit a request is not mandatory, however it will help us ensure the requests are dealt with efficiently and in a consistent manner, especially in terms of recording requests and responding to them. Alternatively, individuals can email us at support@ecobat.com.

10.5 We will always consider the most appropriate format to disclose the information based on your request.

10.6 On some occasions, for instance, where the individual requests large amounts of data, we may require more information to help us meet that request. Where this is the case individuals will be informed as soon as possible that more information is required. The period for responding to the request will begin when any additional information is received. If an individual refuses to provide additional information, we will still endeavor to comply with their request by making reasonable searches for the information covered by the request.

10.7 Ecobat collects personal information relating to children only in the capacity to be related to benefits coverage or beneficiary information. Children can also make subject access requests where we happen to process their personal data. Before responding to a subject access request for information held about a child, the CHRO will consider whether the child is mature enough to understand their rights, taking into account a number of considerations. If so, then the response will be made directly to the child. Parents may also be allowed to exercise the child's rights on their behalf if the child authorizes this, or if it is evident that this is in the best interests of the child.

10.8 In some circumstances, we may refuse to respond to a request. This can be the case if:

- an exemption applies (please see Section 17 for more details);
- it is manifestly unfounded;
- it is excessive;
- it would mean disclosing information about another individual who can be identified from that information, except if the other individual has consented to the disclosure, or it is reasonable to comply with the request without that individual's consent.

10.9 Where we refuse to provide all information responsive to the request, we will explain the reason to the individual (including the exemption if this applies). In those instances, individuals have the right to complain to the relevant supervisory authority and also have the right to judicial remedy without undue delay and at the latest, within one month of us informing you of our decision to not respond to your request.

XI. Right to Rectification

11.1 Individuals have the right to request that any inaccurate personal data we hold about them to be rectified without undue delay in the following circumstances:

- Where those personal data concerning that individual are incorrect; or
- Where personal data concerning that individual are incomplete.

11.2 Employee Data - Employees can usually make changes to your data using the employee self-service portal, if available in your location. Where you are unable to do so, or your rectification request is complex, please send your request to support@ecobat.com.

11.3 In some instances we will require additional documentary evidence from the individual before we can implement any changes to their personal details. For instance, a change in name must usually be supported by appropriate documentation such as a marriage certificate or change of name deed.

11.4 If we have disclosed personal data to others, we will inform the recipients of the rectification or completion of the personal data unless this proves impossible or involves disproportionate effort. If asked to, Ecobat will also inform individuals about these recipients.

11.5 If the personal data is deemed accurate, individuals will be informed that Ecobat will not be amending the personal data it holds. Our decision will be explained, and individuals will be notified of the right to make a complaint to the Information Commissioner's Office (ICO) or another supervisory authority and enforce their rights through judicial remedy.

11.6 We can refuse to comply with a request for rectification if:

- an exemption applies (more details on exemptions at Section 8);
- it is manifestly unfounded; or
- it is excessive.

XII. Right to Erasure

12.1 Individuals have the right to have the personal data which we hold about them erased. This is also known as the 'right to be forgotten'. This right is not absolute and only applies in certain circumstances.

12.2 Individuals have the right to have their personal data erased if:

- the personal data is no longer necessary for the purpose which it was originally collected or processed;
- consent is the lawful basis for holding the data, and individual withdraws their consent;
- legitimate interests is the lawful basis for processing the data, the individual objects to the processing of their data, and there is no overriding legitimate interest to continue this processing;
- the personal data is being processed for direct marketing purposes and the individual objects to that processing;
- the personal data has been processed unlawfully (i.e. in breach of the lawfulness requirement of GDPR); or
- deletion complies with a legal obligation

12.3 If the data to be erased has already been disclosed to other parties, we will contact each recipient and inform them of the erasure, unless this proves impossible or involves disproportionate effort. Where personal data has been made public in an online environment (for example on social networks, forums or websites) we will take reasonable steps to inform other controllers who are processing the personal data to erase links to, copies or replication of that data. When deciding what steps are reasonable, we will consider the cost of implementation and available technology.

12.4 We can comply with a request for erasure if:

- an exemption applies (more details on exemptions at Section 17);
- it is manifestly unfounded; or
- it is excessive

12.5 The right to erasure does not apply to personal data if processing is necessary for one of the following reasons:

- To exercise the right of freedom of expression and information;
- To comply with a legal obligation;
- For the performance of a task carried out in the public interest or in the exercise of official authority;
- For public health purposes in the public interest
- For archiving purposes in the public interest, scientific research, historical research, or statistical purposes; or
- To exercise or defend legal claims.

12.6 In addition, the right to erasure also does not apply:

- to special category data (i.e. data relating to race; ethnic origin; politics; religion; trade union membership; genetics; biometrics (where used for ID purposes); health; sex life; or sexual orientation); and/or
- if processing is necessary for one of the following reasons:
 - for public health purposes in the public interest; or
 - for the purposes of preventative or occupational medicine.

XIII. Right to Restrict Processing

13.1 Individuals have the right to request that we restrict the processing of their personal data where they contest the accuracy of that data and where Ecobat is checking that data for accuracy. Individuals may request that we restrict processing of their personal data because they may have issues with the content of the information which Ecobat holds or how their data has been processed. In most cases, it will not be necessary to restrict the processing of the personal data indefinitely, but the restriction will need to be in place for a certain period. This means that individuals can limit the way that Ecobat uses their data. While verifying its accuracy, we will restrict the processing of that personal data, irrespective of whether the individual have exercised their right to restrict processing.

13.2 The right to restrict processing only applies where:

- the accuracy of some personal data is contested by an individual and the accuracy of that data is being verified;
- the data has been unlawfully processed (i.e. in breach of the lawfulness requirement of the first principle of the GDPR), an individual opposes erasure and requests restriction instead;
- Ecobat no longer needs the personal data, but an individual wants it to be retained in order to establish, exercise or defend a legal claim; or
- an individual has objected to the processing of their data under Article 21(1) GDPR, and Ecobat is considering whether its legitimate grounds override those of the individual.

13.3 If a request to restrict processing has been received and any of the above apply, Ecobat will use methods of restriction that are appropriate for the type of processing that is being carried out. We may:

- Temporarily move the data to another processing system;
- Make the data unavailable to users; or
- Temporarily remove published data from a website.

13.4 We will inform the individual once we have restricted the processing of their personal data. Going forward, Ecobat will not process such data in any way except to store it, unless:

- The individual has provided their consent to such processing;
- It is for the establishment, exercise or defense of legal claims;
- It is for the protection of the rights of another person; or
- It is for reasons of important public interest.

Similarly, we will inform the individual when or if we lift the restriction.

13.5 If the restricted personal data has been disclosed to other parties, Ecobat will inform each recipient of the restriction of the personal data - unless this proves impossible or involves disproportionate effort. If requested, Ecobat will also inform the individual about these recipients.

XIV. Right to Data Portability

14.1 In addition to the right of access to personal information, individuals also have the right to receive their personal data which they provided to Ecobat in a structured, commonly used and machine-readable format (i.e. the data must be in a format that can be automatically read and processed by a computer.)

14.2 This allows the individuals to move, copy or transfer their personal data easily from one IT environment to another, in a safe and secure manner, without affecting its usability.

14.3 This also allows individuals to request that Ecobat transmits their personal data directly to another organisation or data controller. The right to data portability however, does not create an obligation for Ecobat to adopt or maintain processing systems which are technically compatible with those of other organisations.

14.4 The right to data portability only applies to the following:

- To personal data that individuals have provided to Ecobat;
- Where the processing is based on the individuals consent or for the performance of a contract; and
- When the processing is carried out by automated means, i.e. by computer.

14.5 Before any personal data is sent to another organisation or to an individual, steps will be undertaken by Ecobat to check and verify the quality and accuracy of the data in order to comply with the requirements of the accuracy principle of the GDPR. Ecobat will take appropriate measures to ensure that when transmitting

personal data to another organisation or individual, such data is transmitted securely and is sent to the right destination.

14.6 If the personal data is being sent directly to an individual, it is possible that they will store the information in a system with less security than that of Ecobat. Therefore, individuals will need to be made aware of this so that they can take appropriate steps to protect the information they have received.

14.7 Ecobat can refuse to comply with a request for data portability if:

- An exemption applies
- it is manifestly unfounded;
- it is excessive;
- it adversely affects the rights and freedoms of others.

XV. Right to Object to Processing

15.1 In certain circumstances, individuals can object to Ecobat's processing of their personal data. Whether this right applies depends on the purposes for which and the lawful basis under which we process their personal data. Individuals can object if the processing is for:

- A task carried out in the public interest;
- The exercise of official authority vested in Ecobat; or
- Ecobat's legitimate interests (or those of a third party).

In these circumstances the right to object is not absolute.

15.2 Individuals also have a more limited right to object to processing if their personal data is being processed for scientific or historical research, or statistical purposes, although it is unlikely Ecobat will be processing data for these purposes.

15.3 We will inform individuals of their right to object at the time of Ecobat's first communication with the individual, where:

- The personal data is processed for direct marketing purposes, or
- The lawful basis for processing is:
 - A task carried out in the public interest
 - The exercise of official authority vested in Ecobat; or
 - Ecobat's legitimate interests.

15.4 Except where opting out of direct marketing, individuals are required to give specific reasons as to why they object to the processing of their data. We can refuse to comply with the objection request if:

- It can be demonstrated that there are legitimate grounds for the processing, which override the individual's interests, rights and freedoms; or
- The processing is for the establishment, exercise or defense of legal claims.

15.5 Individuals have the absolute right to object at any time to the processing of your personal data for direct marketing purposes. There are no exemptions or grounds for us to refuse to comply with this request. When such requests are received, we will cease any such processing immediately. This includes any profiling of data that is related to direct marketing.

XVI. Right not to be Subject to Automated Decision-Making

16.1 GDPR restricts the ability to make solely automated decisions, including those based on profiling, that have a legal or similarly significant effect on a person and other individuals. These types of effect are not defined in the GDPR, but the decision must have a serious negative impact on an individual to be caught by this provision. A legal effect is something that adversely affects someone's legal rights. Similarly, significant effects are difficult to define. Ecobat will only carry out solely automated decision-making with legal or similarly significant effects if the decision is:

- Necessary for entering or performance of a contract between Ecobat and an individual;
- Authorized by law; or
- Based on explicit consent of the individual.

16.2 If any of our processing is based on solely automated decision making, we will:

- Use appropriate mathematical or statistical procedures;
- Provide individuals with meaningful information about the logic involved in the decision-making process, as well as the significance and the envisaged consequences for the individual;
- Ensure that individuals can express their point of view and obtain human intervention;
- Ensure that individuals can obtain an explanation of the decision, challenge it and request a review of the decision;

- Put appropriate technical and organisational measures in place, to correct inaccuracies, secure personal data in a way that is proportionate to the risk to the interests and rights of individual and minimize the risk of error. This will involve carrying out regular checks to make sure that our systems are working as intended and to prevent errors, bias or discrimination.

XVII. Exemptions

In some instances, exceptions may apply, meaning we cannot fulfil an individual's request. Exemptions will usually have a basis in law. Please contact the Legal Department if you would like to find out some more information on an applicable exemption.

XVIII. Charging a Fee

In some circumstances, we may charge a "reasonable fee" for the administrative costs of complying with a request if it is manifestly unfounded or excessive. "Reasonable fee" will be based on the administrative costs of complying with the request. For instance, where an individual makes a subject access request, we may charge them a further fee if they request additional copies of the data provided to them following their initial subject access request.

XIX. Verifying Identity

We may require additional information from a requestor to verify their identity. We will let the individuals know as soon as possible if more information is required so that we can respond to their request.

XX. Timeframe for Responding to your Request

We will respond to any request without undue delay and at the latest within one month of receipt of the request. Ecobat can extend the time to respond to the request by a further two months if the request is complex or we have received a number of requests from the same requestor. We will let individuals know within one month of receipt of their request if further time is required to deal with us, as well as the reason(s) why.

XXI. Policy Update

This policy and any related standards or procedures will be reviewed at least annually by the CHRO and CCO for relevance to and compliance with applicable laws, regulations, and other requirements or upon any significant changes to the Policy to ensure that it meets legal requirements and reflects best practice.

XXII. Related Policies and Processes

This policy should be read in conjunction with the following policies and processes:

- Ecobat Data Subject Rights Procedure



EU/UK Data Subject
Rights Procedure

Purpose of Document

This document outlines the procedures and guidelines adopted by Ecobat for the effective management of requests from data subjects exercising their rights under the EU General Data Protection Regulation, UK General Data Protection Regulation (collectively known as the GDPR) and other privacy legislation. The purpose of this procedure is to ensure that Ecobat handles such requests consistently, efficiently, and in compliance with legal obligations.

Specifically, this procedure aims to:

- Affirm Ecobat’s commitment to privacy and data protection
- Define clear guidelines for processing data subject rights requests
- Ensure compliance with applicable data protection laws
- Promote transparency and accountability
- Train and inform employees generally on how to handle such requests

Scope

This document applies to all data subject rights requests received by Ecobat from data subjects in the UK and EU.

Definitions

Data Subject

An identified or identifiable natural person. This include third party vendor contacts.

Data Controller

A person or organisation that decides, alone or jointly with others, why and how personal data is processed.

Data Processor

A person or organisation that processes personal data on behalf of the Data Controller.

DSRR

Data Subject Rights Request

Personal Data

Any information relating to an identified or identifiable natural person.

Identifiable Natural Personal

Someone who can be recognized directly or indirectly through details such as their name, ID number, location, online ID, or unique physical, genetic, mental, economic, cultural, or social traits.

Employees

Individuals who work for Ecobat in various capacity, whether permanently or temporarily. This includes officers, consultants, contractors, interns, casual workers, and agency workers.

Privacy Legislation

United Kingdom, Data Protection Act 2018;
Europe Union, General Data Protection Regulation (EU GDPR);
United Kingdom, General Data Protection Regulation (UK GDPR)

Communication or transfer of data

Any disclosure of data to a person other than the data subject.

Consent of the data subject

A clear, explicit, informed, and freely given expression of consent by the data subject for the processing of personal data related to him or her.

Data processing

Operations and technical procedures of an automated or non-automated nature that enable the gathering, recording, storing, processing, altering, blocking, and deletion of data, as well as the transfer of data arising from communications, inquiries, interconnections, and transfers.

Applicant

A person who has made a data subject request.

Roles and Responsibilities

The Chief Executive Officer (“CEO”) is responsible for ensuring compliance with this policy and has delegated day-to-day responsibility for its execution to the Chief Commercial Officer (“CCO”) and Chief Human Resources Officer (CHRO”). Duties and responsibilities of the CCO and CHRO include monitoring and reviewing the operation of the policy, making recommendations for change to minimize risk, and reviewing the policy annually to ensure the policy satisfies applicable legal requirements. The CCO and CHRO may delegate responsibilities to delegates as they may deem necessary or appropriate to assist the CCO and CHRO.

The Data Requests team is responsible for managing all responses to data subject rights requests within organisational and statutory deadlines. When a data subject rights request is received by Ecobat, it is the responsibility of the Data Request team to validate the request and provide an initial response. As many DSRRs are subject to statutory time limits, it is important that these reach the Data Request team as soon as possible after receipt.

The Data Request team is responsible for ensuring requests are forwarded to the relevant Ecobat function(s) in a timely manner and engaging with them to ensure that any queries about the requests are dealt with promptly.

In the case of subject access and portability requests the Data Request team is also responsible for assessing the information, determining the applicability of exemptions, and where necessary preparing it for disclosure. The CEO is ultimately accountable for the responsibilities of the Data Request team.

Employees are responsible for:

- Identifying data subject rights requests
- Referring data subject rights requests immediately to the Data Requests team: support@ecobat.com.
- Co-operating with and assisting the Data Requests team to coordinate responses to requests.

A. PROCESS

This process document outlines the steps and procedures Ecobat follows in managing the following specific rights granted to data subjects under the Privacy Legislation concerning the processing of their personal data.

- The right of access
- The right to rectification
- The right to erasure
- The right to restriction of processing
- The right to data portability
- The right to object to processing
- The right not to be subject to automated decision processing where such a decision produces a legal or similarly significant effect on the individual.

Ecobat has separate procedures for each of the data subject rights.

I. Right to Access

Article 15 of GDPR gives individuals the right to access their personal data. The right of access provides individuals with the right to obtain the following:

- Confirmation that data concerning them are being processed;
- Access to those data; and
- Other supplementary information – this largely corresponds to the information provided in a privacy notice. This includes:
 - The purposes for processing their personal data;
 - The categories of their personal data;
 - The recipients or categories of recipient of their personal data;
 - The retention period for storing their personal data or, where this is not possible, the criteria for determining how long it will be stored;
 - The existence of an individual's right to request rectification, erasure or restriction or to object to such processing;
 - The right to lodge a complaint with the ICO or another supervisory authority;
 - Information about the source of the data, where it was not obtained directly from the individual;
 - The existence of automated decision-making (including profiling); and
 - The safeguards to protect the personal data if it is transferred to a third country or international organisation.

A. PROCEDURE

Step 1 : Receipt of Data Subject Access Request (DSAR)

- Upon receipt of a DSAR, the Data Requests team logs the request and confirms that the data subject is seeking access to their personal data and documents the request in a standard form,
- It is important to note that a request does not have to include the phrase 'subject access request' or refer to 'Article 15 of the GDPR', if the individual is asking for access to their own personal data. It is also not necessary for subject access requests to be made in writing. However, the GDPR requires that organisations 'provide means for requests to be made electronically, especially where personal data are processed by electronic means'. Therefore, a Data Subject Access Request Form has been developed (provided separately) and individuals can complete and submit this form electronically to: support@ecobat.com. The use of this form is not compulsory but using the form makes it easier for individuals to provide sufficient information for Ecobat to be able to identify them and to reference all the necessary data required to locate the information they are seeking.

- The identity of the requestor is verified to ensure that the request is made by the data subject or a legally authorized representative. If identity verification is needed, Ecobat may request additional information.
- Any requests from individuals wanting to exercise their right of access which involve personal data of individuals who might be threatening legal action against Ecobat must immediately be escalated to the legal team at: legalops@ecobat.com.

Step 2 : Identification and Collection of Data

- All relevant employees who might hold data concerning the data subject are notified of the request.
- Employees are required to search for and compile all personal data related to the data subject, including data recorded during professional contacts.
- Collected data should include purposes of processing, data categories, data recipients, data retention periods, rights related to data processing, source of the data if not directly obtained, and details about any automated decision-making processes.
- The Data Requests team sets internal deadlines for data collection based on the complexity and volume of the required information.
- Unless you are making a DSAR in respect of a child's data, your request must relate to how Ecobat processes your personal data. Before we respond to your request, we may require additional information from you to verify your ID.

Step 3: Assessment and Preparation of Response

- The Data Requests team assesses whether the request can be fulfilled within the standard one-month period or if an extension of up to two additional months is needed due to complexity or volume.
- If an extension is required, the data subject is informed within one month of receiving the request, explaining the need for additional time.
- The Data Requests team reviews the collected data for completeness and relevance. They apply necessary redactions and remove duplicates to prepare the data for disclosure.
- **Redaction of third-party information** - If the information to be disclosed contains information of other individuals who are not the requestor, the information can be disclosed if the other individual has consented to the disclosure of their information.

If consent is refused, the relevant information should be redacted.

If, despite redaction, it is still possible to determine the other person's identity it may be necessary to redact more information or withhold certain documents entirely, or if it is not possible to obtain the other person's consent, but it would be reasonable

in the circumstances to disclose the other person's personal data, then the data may be disclosed. To do so, the following factors should be considered:

- whether the information is confidential;
- how sensitive the information is;
- how likely it is that the other person will suffer damage and/or distress if the information were to be disclosed;
- if the data subject already knows the identity of the other person.

When the requestor's data is comingled with other information in a larger email chain or indeed a document or meeting minutes for example, Ecobat is only required to disclose the section of the document that references the individual's personal data. This can be achieved either by redacting (i.e. blanking out) the information that is not relevant, or by extracting the personal data into a new document. It is important to not disclose whole documents/emails that contain information that is not personal data as they may contain data that is confidential to Ecobat.

Step 4: Response to the Individual (Requestor)

- A comprehensive response is prepared, providing the data subject with access to their personal data and supplementary information.
- The response includes information about the individual's rights to rectification, erasure, restriction of processing, and the right to lodge complaints with supervisory authorities.
- The response is issued without undue delay and within the determined timeframe (usually within one month, or up to three months if extended).
- If the data subject has declared that they have a disability, Ecobat will take necessary steps to consider the most appropriate format for disclosure of the information. For instance, a copy of the requested data may be provided in Braille or in an audio format.

Step 5: Handling Fees and Repeat Requests

- The initial copy of the personal data is provided free of charge. For any further copies, a reasonable fee based on administrative costs may be charged.
- If the DSAR is deemed manifestly unfounded or excessive due to its repetitive nature, Ecobat may charge a reasonable fee or refuse to comply, providing reasons and informing the data subject of their rights to appeal to a supervisory authority and seek judicial remedy.

Step 6: Record Keeping and Compliance

- Records of all DSARs received and the responses provided are maintained. These records help track repeat requests and serve as evidence of compliance.
- If a request is refused, the reason is documented, and the individual is informed of their rights to complain and the available legal remedies, within one month of the decision.

II. Right to Rectification

Article 16 of the GDPR includes a right for individuals to have inaccurate personal data rectified. This right to rectification allows individuals to request that the records that Ecobat holds about them containing their personal data are updated without undue delay in the following circumstances:

- Where those personal data concerning that individual are incorrect; or
- Where personal data concerning that individual are incomplete.

The data subject is also entitled to be informed if inaccurate or incomplete data has been disclosed to third party recipients, and Ecobat has the duty to inform these third parties of the rectification, unless this would involve disproportionate effort.

Most routine requests for personal data to be rectified can be completed by the relevant function within Ecobat. Changes to current employee data can be made by the employee themselves using employee self service portal (where available). Where this is not the case, the procedure below should be followed to respond to such requests.

A request to rectify personal data does not need to mention the phrase 'request for rectification' or 'Article 16 of the GDPR' to be a valid request. If the individual has challenged the accuracy of their data and has asked for it to be corrected or has asked that Ecobat takes steps to complete data held about them that is incomplete, this will be a valid request.

A. PROCEDURE

Step 1 : Receipt of Rectification Request

- Upon receipt of a request for rectification, the Data Requests team logs the request, marking it specifically for data rectification.
- The identity of the data subject is verified to ensure that the request is made by the data subject or a legally authorised representative. If identity verification is needed, Ecobat may request additional information.
- Any requests from individuals wanting to exercise their right of rectification which are deemed to be contentious must immediately be sent to the legal team at: legalops@ecobat.com.

Step 2 : Evaluation of Data Accuracy

- Ecobat reviews the personal data in question to assess whether it is indeed inaccurate or incomplete as claimed by the requestor.
- If there is a disagreement regarding the accuracy or completeness of the data, Ecobat is entitled to refuse rectification, taking into account its records and evidence.

Step 3 : Action on Rectification Request

- If the data is verified as inaccurate or incomplete, Ecobat proceeds to rectify the data without undue delay.
- All internal databases and records where this personal data is held are updated accordingly.

Step 4 : Notification to Third Parties

- If the data is verified as inaccurate or incomplete, Ecobat proceeds to rectify the data without undue delay.
- All internal databases and records where this personal data is held are updated accordingly.

Step 5 : Response to Individual (Requestor)

- Ecobat informs the individual about the rectification and any third-party notifications made.
- If Ecobat decides not to rectify the data, a detailed explanation is provided to the individual. This explanation will include the reasons for refusing the rectification and inform the individual of their rights to complain to the relevant Supervisory Authority and the available legal remedies, within one month of the decision.

Step 6 : Record Keeping and Compliance

- Ecobat logs rectification request, actions taken, and communications made in response to the request.

III. Right to Erasure

Under Article 17 of the GDPR, individuals have the right to have the personal data which Ecobat holds about them erased. This is also known as the 'right to be forgotten'. This right is not absolute and only applies in certain circumstances. It is also important to remember that a request does not have to include the phrase 'request for erasure' or 'Article 17 of the GDPR' to be considered valid.

A. PROCEDURE

Step 1 : Receipt of Erasure Request

- Upon receiving a request for erasure, the Data Requests team logs the request, identifying it as an erasure request.
- Verification of the requestor's identity is conducted to ensure the request is legitimate and from the individual or their authorized representative.

Step 2: Evaluation of Request Validity

The Data Requests team evaluates whether the request meets the criteria for erasure based on any of the following basis:

- The data is no longer necessary for its original purpose.
- Consent was the basis for processing, and it has been withdrawn.
- Processing was based on legitimate interests, which are now objected to without an overriding reason to continue.
- The data is used for direct marketing, which the individual objects to.
- The data has been unlawfully processed.
- Erasure is required to comply with a legal obligation.
- The data involves information society services offered to a child.

Step 3: Data Identification and Erasure

- A search is conducted across all relevant Ecobat functions or employees who may hold the personal data are contacted. Employees are required to respond promptly to the Data Requests team's call for information.
- If the request is validated, the data is erased from all systems and backups.

Step 4: Handling Exceptions

Ecobat may refuse to comply with the erasure request if the data is processed for:

- Exercising the right to freedom of expression and information.
- Compliance with a legal obligation or performance of a public interest task or official authority.
- Public health purposes in the public interest.
- Archiving in the public interest, or for scientific, historical research, or statistical purposes.
- Establishment, exercise, or defense of legal claims.
- If a refusal is determined, the decision and its rationale are documented, and the individual is informed without undue delay.

Step 5 : Notification to Third Parties

If the data has been disclosed to third parties, they are notified about the erasure unless this proves impossible or involves disproportionate effort. This ensures that any further processing or dissemination of the data by third parties is halted.

Step 6 : Response to Individual (Requestor)

The requestor is informed about the actions taken on their request, including any erasures or refusals, and the reasons for such decisions. The communication also outlines their right to complain to the relevant Supervisory Authority.

Step 7 : Record Keeping and Compliance

Ecobat logs erasure request, actions taken, and communications made in response to the request.

IV. Right to Restriction of Processing

Article 18 of the GDPR gives individuals the right to restrict the processing of their personal data in certain circumstances. This means that an individual can limit the way that Ecobat uses their data. This is usually an alternative to requesting the erasure of their data. The restriction on the processing personal data may be temporary, particularly when an individual has challenged the accuracy of their data, and it is under investigation or has objected to the processing on grounds related to public interest or legitimate interests. In such cases, the restriction remains until a decision has been made on the accuracy of the data, or on whether Ecobat's legitimate grounds override those of the individual. The individual will be informed before the restriction is lifted.

A. PROCEDURE

Step 1: Receipt of Restriction Request

Upon receiving a request to restrict processing, the Data Requests team logs and categorizes the request. Initial verification of the requestor's identity is conducted to ensure the request originated from the data subject or their legally authorized representative.

Step 2: Assessment of Request Validity

The Data Requests team, in conjunction with relevant Ecobat functions and IT Services, reviews the request to determine if it meets the following criteria for restriction:

- The accuracy of the data is contested by the data subject, and verification is pending.
- The data has been unlawfully processed, but the data subject prefers restriction to erasure.

- Ecobat no longer needs the data, but the data subject requests its retention to establish, exercise or defend a legal claim.
- The data subject has objected to processing based on legitimate interests, and an assessment is needed to determine if these interests are overridden by the data subject's rights.

Step 3: Implementing Restrictions

Appropriate methods are employed to restrict processing based on the nature of the data and its use. These may include:

- Temporarily moving the data to another processing system.
- Making the data unavailable to users.
- Temporarily removing published data from a website.

These actions ensure the data is stored but not further processed or accessed, except under specific conditions outlined by the GDPR.

Step 4: Notification to Third Parties

- All third parties to whom the restricted data has been disclosed are informed about the restriction, unless it will require disproportionate effort to achieve this.
- If requested by the data subject, they are also informed about the third parties to whom the data was disclosed.

Step 5: Response to the Individual (Requestor)

- The data subject is informed in writing about the restriction of processing.
- They are also informed before any lifting of restrictions, particularly in cases where the restriction was due to contested data accuracy or pending decisions on legitimate interests.

Step 6: Handling Refusal

Ecobat can refuse to comply with a restriction request if:

- The request is manifestly unfounded or excessive.
- An exemption applies, detailed in Section 8 of the internal policy.

If a refusal occurs, the decision and its reasoning are communicated to the data subject, informing them of their rights to escalate the matter to the Information Commissioner's Office (ICO) or relevant Supervisory Authority.

Step 7: Record Keeping and Compliance

Ecobat logs restriction request, actions taken, and communications made in response to the request.

V. Right to Data Portability

Article 20 of the GDPR also gives individuals the right to receive their personal data which they have provided to Ecobat in a structured, commonly used and machine-readable format (i.e. the data must be in a format that can be automatically read and processed by a computer).

A. PROCEDURE

Step 1: Receipt of Portability Request

Upon receipt of a data portability request, the Data Requests team logs and categorizes the request. Identity verification of the requestor is performed to ensure the request is legitimate and originates from the data subject or their authorized representative.

Step 2: Assessment of Request Validity

The Data Requests team evaluates if the data portability request meets the following specific criteria:

- The request concerns personal data provided by the data subject to Ecobat.
- The data processing is based on the individual's consent or for the performance of a contract.
- The processing is carried out by automated means.

Step 3: Data Preparation

- Ecobat reviews the data to ensure it is accurate and up-to-date, in line with the accuracy principle of the GDPR.
- Data is prepared in a structured, commonly used, and machine-readable format, such as CSV or XML files, to facilitate easy transfer and usability in different IT environments.

Step 4: Secure Data Transmission

- If the data subject requests, Ecobat transmits the data directly to another organisation or data controller. Ecobat verifies the recipient's details and ensures that the transmission method is secure, typically using encryption or secure file transfer protocols.
- Ecobat informs the data subject about potential security differences if the data is transmitted to personal storage systems or less secure environments, advising on protective measures.

Step 5: Handling Requests to Transmit Data

- For requests involving the transmission of data to another data controller, Ecobat ensures that there are no technical barriers that inhibit the transfer.

Step 6: Refusal of Requests

Ecobat may refuse a data portability request if:

- It is manifestly unfounded, excessive, or involves an undue burden on the system.
- There are legal exemptions that apply.
- It would adversely affect the rights and freedoms of others.

If a refusal occurs, Ecobat provides a detailed explanation to the data subject, informing them of their right to appeal the matter to the Information Commissioner's Office (ICO) or the relevant Supervisory Authority.

Step 7: Response to the Individual (Requestor)

- The data subject is informed about the completion of the data transmission, including any recipient details and the format in which the data was provided.
- Ecobat also advises the data subject on the potential security implications if the data is managed outside of Ecobat's secure environment.

Step 8: Record Keeping and Compliance

- Ecobat logs portability request, actions taken, and communications made in response to the request. This includes documenting any data transmitted and the recipient details to demonstrate compliance and for auditing purposes.

VI. Right to Object

Article 21 of the GDPR gives individuals the right to object to the processing of their personal data at any time. A request does not have to include the phrase 'objection to processing' or 'Article 21 of the GDPR'.

A. PROCEDURE

Step 1: Receipt of Objection Request

- Upon receipt of an objection request, the Data Requests team logs and categorizes the request. The team also verifies the identity of the requestor to ensure legitimacy and that the request is made by the data subject or their authorized representative.

Step 2: Assessment of the Basis for Objection

The team assesses the grounds on which the objection is made relates to any of the following basis:

- If the objection is to processing for direct marketing purposes, Ecobat acknowledges this as an absolute right and no further assessment is required.
- For objections based on processing for a public task, official authority, or legitimate interests, the data subject must provide reasons related to their situation.

Step 3: Immediate Cessation for Direct Marketing

- If the objection is to processing for direct marketing, processing is stopped immediately. This includes any profiling activities related to direct marketing.
- Ecobat ensures that no further marketing communications are sent to the individual, and their details are adjusted in the marketing databases to reflect this preference.

Step 4: Evaluation of Other Objection

For objections not related to direct marketing, Ecobat evaluates whether the reasons stated by the data subject override the legitimate grounds for processing. In doing this, the team considers:

- The public interest or the official authority vested in Ecobat to carry out the processing.
- Whether the processing is necessary for the establishment, exercise, or defense of legal claims.

Step 5: Decision Making

- If it is determined that Ecobat's legitimate grounds for processing override the individual's interests, rights, and freedoms, Ecobat may refuse to comply with the objection. This decision, along with the reasons, is documented.

Step 6: Response to the Individual (Requestor)

- The data subject is informed of the decision regarding their objection. If the objection is upheld, Ecobat will cease processing the personal data as requested.
- If the objection is not upheld, the data subject is informed of the reasons and advised of their right to appeal the matter to the Information Commissioner's Office (ICO) or the relevant Supervisory Authority.

Step 7: Notification to Third Parties

- If the objection is upheld and the data has been disclosed to third parties, those parties are informed to cease processing the data for the purposes objected to by the data subject.

Step 8: Record Keeping and Compliance

- Ecobat logs objection request, actions taken, and communications made in response to the request. This includes documenting the evaluation process, decisions made, and communications with the data subject.

VII. The Right Not to be Subject to Automated Decision Processing

Article 22 of the GDPR restricts organisations from making solely automated decisions, including those based on profiling, that have a legal or similarly significant effect on individuals.

A. PROCEDURE

Step 1: Assessment of Automated Decision-Making Practices

- Ecobat identifies any processes or systems that engage in solely automated decision-making with potential legal or similarly significant effects on individuals.

Step 2: Disclosure and Transparency

- Ecobat provides affected individuals with meaningful information about the logic involved, the significance, and the potential consequences of the automated decision-making. This information is clearly articulated in privacy notices and communications when collecting data.

Step 3: Safeguards and Rights of Individuals

Procedures are established to allow individuals to:

- Express their viewpoints concerning an automated decision.
- Seek human intervention where they disagree with a decision.
- Obtain an explanation of the decision made and challenge it.
- Request a review of the automated decision if they believe it to be incorrect.

Step 4: Implementing Technical and Organisational Measures

- Ecobat implements appropriate mathematical or statistical procedures to ensure fairness and accuracy in automated decision-making.
- Technical and organizational measures are put in place to secure personal data, correct inaccuracies, and minimize the risk of errors, biases, or discrimination.
- Regular checks are conducted on automated decision-making systems to verify they are functioning as intended and are compliant with legal standards.

Step 5: Obtaining Consent When Required

- When automated decision-making is based on the individual's consent, Ecobat ensures that the consent is explicit, informed, and freely given.

Step 6: Handling Requests and Complaints

- A specific process is established for handling inquiries or complaints related to automated decision-making. This includes logging the inquiry, assessing the issue, and responding within the required GDPR timeframes.
- Individuals are informed about how to escalate their complaints to Ecobat's data protection officer or the relevant supervisory authority.

Step 7: Training and Awareness

- Employees involved in designing, implementing, or operating automated decision-making processes are trained on GDPR requirements, ethical considerations, and the technical aspects of maintaining these systems.
- Training programs are regularly updated to cover the latest regulations and technologies impacting automated decision-making.

Step 8: Record Keeping and Monitoring Compliance

- Detailed records of automated decision-making activities, including the rationale for decisions, the measures taken to ensure compliance, and any individual requests or interventions, are maintained.

Role	Name	Phone	Email

