

Data Subject Access Request Policy

1.0 Overview

This Data Subject Access Request Policy sets out the procedure to be adopted by Main One Cable Company Limited and its subsidiaries (collectively referred to as "MainOne") in responding to requests by individuals (Data Subjects) regarding their personal data held by MainOne in line with the provisions of the Nigerian Data Protection Regulation 2019 (NDPR), Ghana Data Protection Act 2012, Law n° 2013-450 of June 19th, 2013 relating to the protection of personal data in Cote d'Ivoire or other relevant law or regulation ("Applicable Legislations").

This Policy should be read in conjunction with MainOne's **Data Privacy and Protection Policy** and MainOne's **Privacy Notices**.

The Data Protection Officers (DPOs) shall be responsible for overseeing this Policy to ensure compliance with the provisions of Applicable Legislations.

2.0 Scope

This Policy is limited to the Personal Data collected by MainOne from Data Subjects. Under applicable legislations, "Personal Data" means any information relating to an identified or identifiable natural person or Data Subject. An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, Identification number, location data, online identifier or to factor(s) specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person. This includes name, address, photo, email address, bank details, posts on social networking websites, medical information, and other unique identifier as provided under applicable legislations.

This Policy applies to all employees, including contracted staff and agents of MainOne, customers, vendors/suppliers of MainOne and the general public.

3.0 Data Subject Rights

3.1 MainOne collects and processes Personal Data of Data Subjects in furtherance of its business operations.

3.2 In line with the provisions of the Applicable Legislations, Data Subjects are entitled to the rights below:

- a) Right to request for and access Personal Data collected and stored by MainOne.
- b) Right to object to processing of Personal Data.
- c) Right to be informed of and provide consent prior to the processing of data for purposes other than that for which the Personal Data were collected.
- d) Right to object to automated decision making and profiling.
- e) Right to withdraw consent at any time.
- f) Right to request rectification and modification of your data kept by MainOne.
- g) Right to request for deletion of your data collected and stored by MainOne and
- h) Right to request the movement of data from MainOne to a Third Party
i.e. the right to the portability of data.

3.3 Any request as it relates to implementation of the above rights shall be carried out by completing and submitting the **Subject Access Request Form (SAR Form)** in accordance with the terms of this Policy.

4.0 Subject Access Request Response Procedure

- 4.1 Where a Data Subject wishes to exercise any of the rights guaranteed under the Applicable Legislations, they shall make a formal request by completing the SAR Form (**See Appendix 1**) and sending the completed form via email to the Data Protection Officer (DPO) at dataprotectionofficer@mainOne.net
- 4.2 MainOne shall contact the Data Subject **within** 5 working days of the receipt of the SAR Form to confirm receipt of the subject access request and may request additional information to verify and confirm the identity of the individual making the request.
- 4.3 The DPO, on receiving any request from a Data Subject, shall record the request and carry out verification of the identity of the individual making the request using the details provided in the SAR Form and a valid means of identification such as international passport, driver's license, national identification card, employee identity card issued by MainOne or any other acceptable means of identification.
- 4.4 Where the request is from a third party (such as relative or representative of the Data Subject), MainOne will verify their authority to act for the Data Subject and may contact the Data Subject to confirm their identity and request the Data Subject's consent to disclose the information.
- 4.5 When the identity of the individual making the request is verified, the DPO shall coordinate the gathering of all information collected with respect to the individual in a concise, transparent, intelligible and easily accessible form, using clear and plain language with a view to responding to the specific

request. The information may be provided in writing, or by other means, including, where appropriate, by electronic means or orally provided that the identity of the Data Subject is proven by other means.

- 4.6 Where the information requested relates directly or indirectly to another person, MainOne will seek the consent of that person before processing the request. However, where disclosure would adversely affect the rights and freedoms of others and MainOne is unable to disclose the information, MainOne will inform the requestor promptly, with reasons for that decision except where otherwise provided under the Applicable Legislations.

5.0 Fees and Timeframe

- 5.1 MainOne shall ensure that it provides the information required by a Data Subject or respond to the request by the Data Subject within a period of one month from the receipt of the request. However, where MainOne is unable to act on the request of the Data Subject, it shall inform the Data Subject promptly at least within one month of receipt of the request of the reasons for not taking action and notify them of the option of lodging a complaint with the relevant data protection supervisory authority in accordance with the Applicable Legislations.

- 5.2 Any information provided to the Data Subject by MainOne shall be provided free of charge. However, where requests from a Data Subject are manifestly unfounded or excessive in particular because of their repetitive or cumbersome nature, MainOne may subject to the provisions of the Applicable Legislations:

- a. Charge a reasonable fee taking into account the administrative costs of providing the information or communication, taking the action required or making a decision to refuse to act on the request; or
- b. Write a letter to the Data Subject stating refusal to act on the request and copying the relevant data protection supervisory authority

6.0 Exceptions to Data Subjects Access Rights

To the extent permitted by applicable legislations, MainOne may refuse to act on a Data Subject's request, if at least one of the following applies:

- a) In compliance with a legal obligation to which MainOne is subject.
- b) Protecting the vital interests of the Data Subject or of another natural person.
- c) For public interest or in exercise of official public mandate vested in MainOne.

7.0 Related Policies and Procedures

This Policy shall be read in conjunction with the following policies and procedures of MainOne:

- a) Data Privacy and Protection Policy
- b) Cryptographic Policy
- c) Document Retention Policy
- d) Personal Data Breach Management Policy

8.0 Changes to the Policy

MainOne reserves the right to change, amend or alter this Policy at any point in time. If we amend this Policy, we will issue an updated version.

9.0 Contact for any Enquiries

MainOne has appointed DPOs responsible for overseeing MainOne's data protection strategy and its implementation to ensure compliance with requirements of Applicable Legislations.

The DPO should be contacted if you have any queries or clarifications regarding the operation of this Policy. The DPO contact details are dataprotectionofficer@mainone.net

Definition/Abbreviations

Term/Abbreviation	Explanation
Data Protection Officer (DPO)	Means the Data Protection Officer, who is appointed to assist MainOne monitor internal compliance, inform and advise on data protection obligations, provide advice regarding DPIAs and act as a contact point for Data Subjects and the supervisory authority.

Data Subject	Any person, who can be identified, directly or indirectly, by reference to an identification number or to one or more factors specific to his physical, physiological, mental, economic, cultural or social identity.
DPIA	Data Protection Impact Assessment
Personal Data	Means any information relating to an identified or identifiable natural person ('Data Subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person; It can be anything from a name, address, a photo, an email address, bank details, posts on social networking websites, medical information, and other unique identifier such as but not limited to MAC address, IP address, IMEI number, IMSI number, SIM, Personal Identifiable Information (PII) and others.

Processing

Any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

APPENDIX 1

Data Subject Access Right Form

Note: By completing this form, you consent that MainOne would use your personal data to process your request and provide you with relevant response to your inquiries.

Your rights as a data subject can be exercised by completing this form and submitting via an email or to the address at the bottom of this form	
In Person <input type="checkbox"/>	<input type="checkbox"/> By Proxy
Date ___/___/20__	
Details of the Person Requesting Information	
Full Name:	
Date of Birth:	Telephone No:
Contact Address:	
Details of Proxy (If Applicable)	
Surname/ Family Name:	
First Name(s)/Forenames:	Telephone No:
Date of Birth:	Email Address:
Contact Address:	
Relationship to the data subject:	
<i>A Proxy must enclose a copy of a power of attorney or data subject's written authority and proof of the data subject's identity and proxy's identity (such as Passport, driving license, national identity card, birth certificate etc.)</i>	
<u>Any other Information that may help us</u>	

Please tick the appropriate box and read the instructions which follow it:

Right of Access	[]	Right to
Erasure	[]	
Right to Object	[]	Right to
Portability	[]	
Right to Rectification	[]	Right to
Restriction of Process	[]	

Details of Request: *Please describe the information you are seeking. Please provide any relevant details you think will help us to identify the information you require.*

Preferred Medium of Feedback

Please tick the appropriate box below:

- Email as provided in our database
[]
- Formal letter dispatched to Correspondence Address as provided in our database []
- Main One [*Please complete as applicable*] Limited Head Office

I confirm that I have read and understood the MainOne Data Subject Access Request Policy and the Data Privacy and Protection Policy. In consideration of all the information stated herein, I certify that the information provided in this form is correct to the best of my knowledge and that I am the person to whom it relates.

Name:

Signature:

Date:

For postal requests, please return this form

to: Data Protection Officer **Main One**

All email requests should be sent to dataprotectionofficer@mainone.net