

Request for Personal Data Collected and Processed by the iFLEX Project

Instructions and Subject Access Request (SAR) Form

RIGHT OF ACCESS

Under Article 15 of the GDPR, an individual has the right to obtain confirmation as to whether personal data concerning them is being processed. The iFLEX project is committed to upholding the rights of individuals and has dedicated processes in place for providing access to personal information.

Where requested, we will provide the following information in relation to your data:

- the purposes of the processing
- the categories of personal data concerned
- the recipient(s) or categories of recipient(s) to whom the personal data has been or will be disclosed
- If the data has been transferred to a third country or international organisation(s) (and if applicable, the appropriate safeguards used)
- the envisaged period for which the personal data will be stored (or the criteria used to determine that period)
- where the personal data was not collected directly from the individual, any available information as to its source.

Please note that you may find information about all of the above in our [Privacy Notice](#).

WHAT IS PERSONAL INFORMATION?

Information protected under the GDPR is known as 'personal data' and is defined as:

"Any information relating to an identified or identifiable natural person; 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." (Art. 4 GDPR)

Please note that in the iFLEX project your personal data will be used in pseudonymised form. For example, to locate your smart meter, a unique identifier will be used rather than your home address.

HOW DO I MAKE A REQUEST?

Our SAR form on the last page lets you specify your request. Please be as specific as possible as this will help us expedite your request. You also need to fill in your contact details and sign the SAR form.

Your Rights

Under the GDPR, you have the right to:

- request access to your personal that we hold
- request rectification of your personal data
- request deletion of your personal data
- request a restriction of the processing of your personal data
- request data portability
- object to the processing or withdraw your consent.

As a pilot participant

Please fill in the SAR Form below and email it to your local pilot host. If you are unable to submit a request by email, you may print out the SAR Form and post it.

Greek pilot

HERON THERMOILEKTRIKI
SOCIÉTÉ ANONYME
Leof. Kifisias 124
Athens 115 26
Greece
Email: R&D@heron.gr

Slovenian pilot

ECE d.o.o.
Vrunčeva ulica 2a
3000 Celje
Slovenia
Phone: +386 080-2204
Email: info@ece.si

Finnish pilot

VTT Technical Research Centre of
Finland Ltd,
Kaitoväylä 1
90571 Oulu
Finland
E-mail: iFLEX-Info@vtt.fi

If you do not participate in a pilot but have filled in a project survey

If you provided your personal information (e.g. to participate in a price draw) in one of the iFLEX project's public surveys you please email or post your SAR form to the project's Ethical Manager:

Trine F. Sørensen
In-JeT ApS
Jeppe Aakjærs Vej 15
3460 Birkerød
Denmark
Phone Number: +45 3160 7365
Email: tfs@in-jet.dk

Please remember to sign the Declaration Statement on the final page. To sign a PDF form, you can type, draw, or insert an image of your signature or initials:


1) In *Adobe Acrobat*, select **Sign** from the top tools bar. Alternatively, from the **All tools** menu, select **Fill & Sign**.

2) Create your signature and initials:

1. From the Quick actions toolbar, select 

2. To add a signature, select **Add signature**. In the dialogue that appears, type or draw your signature and then select **Done**. You can also add an image of your signature.

3. To add your initials, select **> Add initials**. In the dialog that appears, type or draw your initials and then select **Done**.

3) From the Sign panel, select your signature, move over to the field where you want to add it and then click to place the signature. Alternatively, from the Quick actions toolbar, select  and then select your signature.

WHAT HAPPENS ONCE I HAVE SUBMITTED A REQUEST?**Identity Verification**

The iFLEX Ethical Manager will send you an acknowledgement of the request and a record of the request is made. We will utilise the request information to ensure that we can verify your identity and where we are unable to do so, we may contact you for further information, or ask you to provide evidence of your identity prior to actioning any request. This is to protect your information and rights.

Information Gathering and Provision

If you have provided enough information in your SAR to gather the personal information held about you, we will gather all documents relating to you. If we do not have enough information to locate your records, we may contact you for further details. This will be done as soon as possible and within the time-frames set out below.

The iFLEX project will not keep any personal identifiable data longer than is necessary for the purpose it was collected. It will only be kept longer if required under any contract, by applicable law, or with regard to our statutory obligations. After this time, personal identifiable data is deleted irretrievably. If your request is received after this deadline, we will inform you. Whenever possible, personal identifiable data will be anonymised. We will inform you if this is the case.

Once we have gathered all the personal information held about you, we will send this to you in an encrypted email unless you have specifically requested to receive the information by post on your SAR form.

What information will I receive?

The subject access right allows individuals the right to access personal data of which they are the subject. It does not provide the right to access data that do not fully comprise the personal data of the individual. Therefore, in response to a subject access request, you may only receive partial data.

Can I access the personal data of other individuals?

An individual only has the right to access personal data of which they are the subject and there is no right of access to the personal data of friends or family.

However, there are some instances in which a request made on behalf of another individual or for a specific purpose will be considered. Please refer to this section below for further information.

Making a third-party request for personal data

There are some circumstances under which the iFLEX project will consider a request for access to personal data on behalf of another individual, or a request for access to personal data of another individual without their consent. These are:

- The requester is the parent of a child under the age of 18
- The requester has the written permission to make a request on behalf of another individual
- The requester has Power of Attorney or an order from the Court of Protection to act on behalf of another individual
- The iFLEX project deems that release can be justified under crime and taxation provisions.

In these circumstances, the iFLEX project may seek further information from the requester in order to help determine whether we can release any personal data.

A request for access to personal data made on behalf of another individual

A request for access to personal data made on behalf of another individual will need to be accompanied by a signed letter from the data subject which contains consent to the release of all or specific personal data to the requester. Such requests are typically made by solicitors acting on behalf of a client. A request for access to personal data made on behalf of an adult who does not have the capacity to make a request themselves will need to be accompanied by proof that the requester has the authority to act on behalf of the data subject, such as through Power of Attorney or an order from the Court of Protection. Where authority is not provided, the iFLEX project will consider on a case-by-case basis whether release of the personal data requested is in the best interests of the data subject. Please follow the subject access request process above, submitting a copy of a form of ID for yourself and the data subject and proof of your authority to act on behalf of the data subject.

TIME FRAMES AND FEES

We aim to complete all requests made on our SAR form within 30 days of receipt. However, where the retrieval or provision of information or other request is particularly complex or is subject to a valid delay, the period may be extended by two months. If this is the case, we will always provide a written explanation to you within 30 days and inform you of your right to complain to the Supervisory Authority and to seek a judicial remedy.

Whilst we provide the requested action or information without a fee, further copies of personal data requested by the same individual may incur a charge to cover our administrative costs.

EXEMPTIONS AND REFUSALS

The GDPR contains certain exemptions from the provision of personal information. If one or more of these exemptions applies to your subject access request or where the iFLEX project does not act upon the request, we shall inform you at the earliest convenience, or at the latest, within one month of receipt of the request. Where possible, we will provide you with the reasons for not acting and any possibility of lodging a complaint with the Supervisory Authority and your right to seek a judicial remedy. Details of how to contact the Supervisory Authority are laid out in below.

LODGING A COMPLAINT

If you are unsatisfied with our actions or wish to make an internal complaint, you can contact your local pilot host by email or in writing. See contact details above.

Alternatively, you may also contact our Ethical Manager or our Project Co-ordinator:

iFLEX Ethical Manager:

Trine F. Sørensen
In-JeT ApS
Jeppe Aakjærs Vej 15
3460 Birkerød
Phone Number: +45 3160 7365
Email: tfs@in-jet.dk

iFLEX Project Co-ordinator:

Markus Taumberger
VTT Technical Research Centre of Finland
P.O.Box 1000
FI-02044 VTT
Finland
Phone Number: +358 50 465 2474
Email: markus.taumberger@vtt.fi

Supervisory Authority

If you remain dissatisfied with our actions, you have the right to lodge a complaint with the lead Supervisory Authority.

The Finnish Data Protection Ombudsman can be contacted at:

P.O. Box 800
Ratapihantie 9, 6th floor
00521 Helsinki
Finland
Phone Number: +358 29 56 66700
Email: tietosuoja@om.fi
www.tietosuoja.fi

Subject Access Request Form

Under Article 15 of the GDPR, an individual has the right to obtain from the controller, confirmation as to whether personal data concerning them is being processed. We are committed to upholding the rights of individuals and have dedicated processes in place for providing access to personal information.



The information that you supply via this form will be entered into a filing system and will only be accessed by authorised persons of the iFLEX project. The information will be retained by the iFLEX project and will only be used for the purpose of (a) processing your Subject Access Request and audit purposes. By supplying such information, you consent to the iFLEX project storing the information for the stated purposes. The information is held by the iFLEX project in accordance with the provisions of the General Data Protection Regulation (GDPR). After receiving your subject access request, we may contact you to request additional supporting information and/or proof of your identity. This helps us to safeguard your privacy and personal data.

iFLEX Pilot Participants

To ensure that we locate and provide the right personal data, please confirm your:

Phone number	<input type="text"/>
iFLEX user ID <i>(this will be the unique identifier you have been issued with upon registering in the iFLEX pilot)</i>	<input type="text"/>

INFORMATION BEING REQUESTED

By completing this form, you are making a Subject Access Request under the GDPR for personal data collected, processed, and held about you by us (the iFLEX project) that you are entitled to receive. Please make sure you sign the DECLARATION STATEMENT at the bottom of this form.

Please indicate the nature of your request	Please tick	Please provide specific details of the information and/or action being requested
Data Access Request <i>You have the right to ask us for copies of your personal information.</i>	<input type="checkbox"/>	
Data Rectification Request <i>You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete your personal information when you think is incomplete.</i>	<input type="checkbox"/>	
Data Erasure Request <i>You have the right to ask us to erase your personal information.</i>	<input type="checkbox"/>	
Restriction of Data Processing <i>You have the right to ask us to restrict the processing of your personal information.</i>	<input type="checkbox"/>	
The right to data portability <i>You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.</i>	<input type="checkbox"/>	
Object to Processing or Consent Withdrawal <i>You have the right to object to the processing of your personal information.</i>	<input type="checkbox"/>	
Other <i>Please specify in the comment field. You may find it useful to consult the project's Privacy Notice for details on how your personal data is handled.</i>	<input type="checkbox"/>	
I would like to receive the information I have requested by	Email <input type="checkbox"/> Email address: <input type="text"/>	Letter <input type="checkbox"/> Postal address: <input type="text"/>

DECLARATION STATEMENT

By signing below, you confirm that you are the data subject named in this Subject Access Request Form. You warrant that you are the individual named and will fully compensate the iFLEX Project for all losses and expenses incurred if you are not. We cannot accept requests in respect of your personal data from anyone else, including members of your family, unless the criteria specified above have been fulfilled.

Name	<input type="text"/>
Signature	<input type="text"/>
Date	<input type="text"/>

To email this form, make sure to save it first and then send it as an attachment to your email.

To add your signature or initials, select **Sign** from the top tools bar. Alternatively, from the All Tools menu, select **Fill & Sign**. Next, select **Add Signature** or **Add Initials** and either type, draw or add an image of your signature or initials.