



Right to Be Forgotten and Subject Access Requests

This document outlines the process to be followed should a Registrant or Group Member submit a request to an Organizer for a record of their personal data on file, or the right to be forgotten.

Definitions

“GDPR” is General Data Protection Regulation. It is a regulation on the protection of personal data and digital privacy.

“Personal Data” means any information relating to an identified or identifiable natural person (‘data subject’).

“Processing” means 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.

“Controller” means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.

“Processor” means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the Controller.

“Consent” of the data subject means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

“Event Portal” means the online administration portal and public facing portal provided by PASS for Organizers to connect with Registrants.

Right to be Forgotten

Under Article 17 of the GDPR, individuals have the right to be forgotten:

1. The data subject shall have the right to obtain from the Controller the erasure of personal data concerning him or her without undue delay and the Controller shall have the obligation to erase personal data without undue delay.

Under GDPR it is the Controller's responsibility to respond to requests to be forgotten. As such, should any Organizer receive a request to be forgotten, whether via email or verbally, this request must be forwarded to Governance@pass.org in a timely manner. PASS has 1 month to comply with a request to be forgotten.

Upon receiving a request at Governance@pass.org, PASS will make proportional effort to confirm the identity of the Requestor, and to confirm the request. Proportional effort takes into account the type of data being requested, and scale of information. The right to erasure is not absolute. PASS will evaluate the request to confirm that erasure is the appropriate course of action and not in conflict with necessary processing.

Upon meeting the criteria for the right to be forgotten, PASS will proceed with systematically ensuring processing on the data subject's ceases.

As Processor, and as outlined under Article 28, paragraph 3 section e, Processors are expected to support the Controller's obligations to respond to requests for exercising the data subject's rights.

As Processor, Organizers are solely responsible to protect the privacy of any data in possession that has been collected and processed from the PASS website. As an Organizer and Processor, if these obligations are breached, Organizers could be held liable for compensation.

Working with the Organizer, PASS will ensure the request to be forgotten is executed within the 1-month time-frame permitted for any such requests.

Subject Access Request

Should a Registrant approach an Organizer with a request for information relating to his or her profile data, the Organizer will email Governance@pass.org. Requests may be made verbally or in writing to the Organizer. Any requests received by Organizers must be submitted in writing to Governance@pass.org

Under GDPR it is the Controller's responsibility to respond to personal data information requests. As such, should any Organizer receive a request relating to what data PASS has associated with an individual's profile, whether via email or verbally, this request must be forwarded to Governance@pass.org in a timely manner. PASS has 1 month to comply with requests for information on data.

Upon receiving a request at Governance@pass.org, PASS will make proportional effort to confirm the identity of the Requestor, and to confirm the request. Proportional effort takes into account the type of data being requested, and scale of information. Upon confirmation, PASS will action the request for data information.

As Processor, and as outlined under Article 28, paragraph 3 section e, Processors are expected to support the Controller's obligations to respond to requests for exercising the data subject's rights. Organizers are expected to provide assistance to PASS as required in completing any request for data.

As Processor, Organizers are solely responsible to protect the privacy of any data in possession that has been collected and processed from the PASS website. As an Organizer and Processor, if these obligations are breached, Organizers could be held liable for compensation.