



## How to Make a Data Subject Access Request

### Overview and Scope

The EU [General Data Protection Regulation 2016/679](#) (“GDPR”) and the [California Consumer Privacy Act of 2018](#) (“CCPA”), provide certain data subjects and consumers (“Data Subjects”) a variety of rights in relation to the personal data and information about them that Signature Aviation (“Signature”) holds and/or processes.

This notice, a supplement to Signature’s [Privacy Policy](#), sets out the steps to be followed for submitting, handling and responding to requests for access to their own personal data that may be made by Data Subjects, their representatives or other interested parties. It enables us to comply with our Data Subject Access Request (“DSAR”) obligations under the GDPR and CCPA and outlines the protocols we follow when such requests are received.

This procedure applies across all entities and/or subsidiaries owned, controlled or operated by Signature, and to all employees, including part-time, temporary or contract employees, that handle Signature’s data.

### Rights of EU Data Subjects and California Consumers

#### EU Data Subjects

The GDPR provides Data Subjects with the right to submit a written or verbal request for their personal data and obtain a copy of that data in a permanent and intelligible format.

This means that, as an EU Data Subject, you also have the right to obtain information about your personal data, including the following: the purposes for which Signature was, or is, processing your personal data; the categories of data concerned; the entities and/or recipients of the data; the envisaged period during which your personal data will be stored, and/or the criteria used to determine same; and the source from which your personal data was, or is, obtained.

You also have the right to information on your rights to request access, rectification, erasure or restriction of/objection to processing of personal data; and to complain with a supervisory authority.

To learn more regarding what personal data we collect and for what purpose, as well as more about your rights under the GDPR, please refer Signature’s [Privacy Policy](#) or contact [dataprivacy@signatureaviation.com](mailto:dataprivacy@signatureaviation.com).

#### California Consumers

The CCPA provides California Data Subjects the right to request information regarding their personal information, a copy of their personal information, and deletion of their personal information.

This means that, as a California Data Subject, you have the right to obtain information about your personal information, including the following: the specific pieces of personal information that have been collected; the categories of collected personal information; the categories of sources from which the personal information was, or is, collected; the categories of personal information that was, or is, sold or disclosed for a business purpose; the categories of third parties with which the personal information was, or is, sold or disclosed; and the business or commercial purpose for collecting or selling such personal information.

You also have the right to receive a copy of your personal data and to request that Signature delete your data.

To learn more regarding what personal information we collect and for what purpose, as well as more about your rights under the CCPA, please refer Signature's [Privacy Policy](#) or Signature's [Notice for California Consumers](#) or contact [dataprivacy@signatureaviation.com](mailto:dataprivacy@signatureaviation.com).

## Data Subject Access Requests (“DSARS”)

### What is a DSAR?

A DSAR is any request made by a Data Subject, or a Data Subject's legal representative, for information that is held or processed by the Company about that individual. DSARs may be made by a representative or third party only if written, verified consent is provided by the Data Subject.

In response to a DSAR (unless an exemption applies), Signature is required to provide the requested information in a readily useable format that enables the Data Subject's transmission of the information from one entity to another entity without hindrance.

### How do I submit a DSAR?

To allow us to respond promptly to any DSARs, we ask you to visit our [DSAR Portal](#).

Use of the DSAR Portal is not mandatory. An individual may also submit a DSAR using any available method, including verbally in person, over the phone, in a written letter, or via any contact on our website or social media.

DSARs may also be submitted via our Business Ethics Hotline at 1-888-708-0803 (from the US or Canada), 0800-89-0011 followed by 888-708-0803 (from the UK) or online at <https://bba.alertline.com> or by electronic or regular mail. If you wish to write to us, please submit your request, along with proof of identity and address, to [dataprivacy@signatureaviation.com](mailto:dataprivacy@signatureaviation.com) or to the following address:

Signature Aviation CHQ  
Attn: Data Protection – Legal Department  
13485 Veterans Way, Suite 600  
Orlando, FL 32827

or

Signature Aviation  
Attn: Data Protection – Legal Department  
105 Wigmore Street  
London, W1U 1QY

An individual need not use the terms “subject access request,” “DSAR,” “GDPR,” “CCPA” or any other term of art, as long as it is clear that they are requesting their own personal data or that of a Data Subject they are authorized to represent.

### How does Signature handle DSARs?

#### Responsibilities

DSARs can be made to anyone within Signature, including frontline staff. All Signature employees will be, or have been, made cognizant of their obligations with respect to DSARs under the GDPR and CCPA. Though we are able to respond most promptly to DSARs submitted via our DSAR Portal, we will process all DSARs received in any form whether it be via verbal request, email, mail, fax, social media, etc. The requestor does not have to specify the applicable law (GDPR/CCPA) or that they are submitting a DSAR, for it to constitute a valid request.

All Signature employees must contact [dataprivacy@signatureaviation.com](mailto:dataprivacy@signatureaviation.com) or Signature's Legal Department as soon as they become aware that they have received a DSAR or think they may have received one. There are regulatory time limits, that commence from the moment the data subject or consumer makes contact with Signature to complete the DSARs, so

it is critical to notify [dataprivacy@signatureaviaition.com](mailto:dataprivacy@signatureaviaition.com) as soon as possible. Upon receipt, Signature records the DSAR and tracks it to fulfillment.

Employees are encouraged to contact [dataprivacy@signatureaviaition.com](mailto:dataprivacy@signatureaviaition.com) or to contact Signature's Legal Department to discuss any queries related to DSARs or Data Protection more generally.

### **Identity Verification**

When a DSAR is submitted, and a record of the request is noted, Signature uses all reasonable measures to verify the identity of the individual making the request, especially where the request is made using online services.

We may verify a requestor's identity by reviewing suitable documentation, such as a valid passport, identity card, driving license, or birth certificate (along with some other proof of address dated no less than three months prior).

Usually, we will have no reason to doubt a person's identity. However, in situations where we are unable to validate a requestor's identity, we may ask the requestor for additional information or evidence of identity prior to actioning the DSAR. This delay is intended to protect the information and rights of our Data Subjects.

If a third party, relative or representative is requesting the information on behalf of a Data Subject, we will verify their authority to act for that individual; and again, may request additional information to confirm their identity and gain authorization prior to actioning any request.

### **Information Gathering**

If Signature has received enough information from the requestor to verify the requestor's identity, we will then conduct a full search of our relevant data and collect all that is applicable to respond to the DSAR.

If we do not have enough information to locate relevant records, we will promptly contact the requestor for further details.

### **Information Provision**

Once Signature has collated all the relevant personal information, we will then share the data to which the requestor is entitled—provided that no legal restrictions apply. The information will be provided in a concise, transparent, intelligible and easily accessible format, using clear and plain language.

By default, we will dispatch the information electronically via a secure, monitored system—preferably via our secure [DSAR Portal](#)—and will seek timely confirmation of its receipt by you.

### **Timeframe**

The GDPR requires organizations to respond to DSARs within one month. Businesses subject to the CCPA must respond within 45 days.

We always aim to provide the requested information at our earliest convenience, but at a maximum, within 30 days from the date the request is received. However, where the retrieval or provision of information is particularly complex, or is subject to a valid delay, the period may be extended by an additional 60 days. If this is the case, we will write to you within 30 days and keep you informed of the delay and underlying reasons.

In the event we request additional information to enable us to comply with your request, your request will be dealt with within 30 days following receipt of such information.

### **Fees**

Signature will not charge a fee for the initial provision of records, whether provided in manual or electronic format. Subsequent copies may incur a charge to cover our administrative costs. Fees may also be charged if a request is "manifestly unfounded or excessive." In such a case, Signature will charge a reasonable fee that takes into account the administrative costs of responding to the request, or will refuse to act on the request, subject to further discussion.

## Concerns or Complaints

If you are not satisfied by our actions, you can seek recourse by emailing [dataprivacy@signatureaviation.com](mailto:dataprivacy@signatureaviation.com). If you remain dissatisfied, and are an EU data subject, you have the right to refer the matter to the Information Commissioner. The Information Commissioner can be contacted at:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF  
Telephone: 01625 545 745  
Fax: 01625 524 510  
Email: [enquiries @ico.gsi.gov.uk](mailto:enquiries@ico.gsi.gov.uk)

To learn more about Signature's privacy principles, see our [Privacy Policy](#) or contact [dataprivacy@signatureaviation.com](mailto:dataprivacy@signatureaviation.com).