



Data Subject Access Request Policy

Version History

Version	Date	Author	Change Summary
1.11	08/06/2023	Erica Duong	Minor changes
2.0	05/03/2024	Erica Duong	Annual review, updated branding
3.0	04/30/2025	Erica Duong	Annual review
4.0	03/24/2026	Erica Duong	Annual review, revised process

Purpose

This document defines how ComputerTalk handles and responds to Subject Access Requests (SARs) for personal data processed on behalf of Data Controllers, ensuring compliance with the General Data Protection Regulation (GDPR). This document complies with the requirements of ISO/IEC 27001:2022 Annex A.5.33 and A.5.34 and supports adherence to PCI DSS and SOC 2 standards.

Scope of Application

This document applies to all personal data processed by ComputerTalk on behalf of controllers, all staff involved in handling SARs, and all systems, applications, and environments where such data is stored or processed. "ComputerTalk" refers to Computer Talk Technology Inc. and ComputerTalk Global Corp.

Review and Authorization

1. The Compliance Officer reviews and updates this document annually or as needed following significant changes.
2. ComputerTalk's Executive Team authorizes this document.
3. The Executive Team approved this document on April 22, 2026.

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1. Introduction

Individuals have the right to access their personal data and related information, enabling them to understand and verify how their data is being processed. ComputerTalk is committed to complying with the GDPR and supporting Data Controllers in fulfilling SARs.

2. Roles and Responsibilities

Overall responsibility for SAR compliance at ComputerTalk rests with Jennifer Sutcliffe, Data Protection Officer (DPO). The ComputerTalk Help Desk manages SARs and is responsible for logging and tracking requests, acknowledging receipt, verifying the requester's identity, maintaining records, and following the Data Controller's instructions to fulfill the request.

3. Subject Access Request Process

SARs must be submitted electronically to the Help Desk (en-support@computer-talk.com). A SAR is a request from an individual or an authorized representative for confirmation of whether their personal data is processed and access to that data, as instructed by the Data Controller. If an incident or inquiry may involve a SAR, staff must promptly notify dataprivacy@computer-talk.com.

All SARs are logged as Severity 4 tickets in Dynamics. Requester identities are verified to ensure they are authorized customer contacts before processing. ComputerTalk processes SARs strictly in accordance with the Data Controller's instructions. Personal data relating to other individuals is redacted or handled as directed by the controller. Requests are fulfilled within 30 calendar days, as required by GDPR. For SARs involving customer-managed records, such as those in iceManager or iceJournal, authorized personnel on the customer's side manage the data. ComputerTalk provides the requested personal data and any supplementary information as instructed by the controller.

ComputerTalk acts as a Data Processor and does not process end users' personal data directly, except under the instructions of the Data Controller. SARs are handled strictly in accordance with the controller's guidance and the scope of the services provided.