



Data Privacy - Employee request

Process how to handle employees requests

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Owner	HR	Pages	8
Source	InfoSec > public documents > initiatives > GDPR in IT > employee requests		

1 Purpose of use

- Data Subjects must have the ability to ask how the company is handling their privacy data as well as to object against the usage.
- Constellium must efficiently fulfill this request, securely transmit the data to the individual and generate the proper documentation and evidence should a regulator inquire about the request.

2 Trigger

- A data subject (this can be an employee, contractor, customer , or anybody from whom personal data is processed within Constellium) places a request for information or modification of his privacy data. This can be done either by using the Servicedesk portal or by using a paper form.

3 Implementer

- DPO, HR and IT

4 Procedure

4.1 Pre-requisites

- a. Data Privacy request form will be available in one of the two ways:
 - a. Paper based form (appendix 2)
 - b. Via ITSM Tool (Constellium IT Servicedesk) **tbd, add link here**
- b. If a paper form was used, the request needs to be sent by the requestor to the relevant person outlined in Appendix 1.
- b. If ITSM was used filled out by the data subject, an Email will be sent automatically by ITSM to the relevant person outlined in Appendix 1 (not yet implemented)



4.2 Steps

4.2.1 initial assessment

The person, who receives the request (see appendix 1), needs to perform an initial verification of the request to ensure that the request is appropriate and that the requestor is legitimated.

The actions in this step must be documented. This can be done by using the form in appendix 2.

4.2.2 fulfillment of the request

The request must be forwarded to the responsible person for data privacy (normally the DPO of the site or , in asence of a DPO: HR). contacts see appendix1

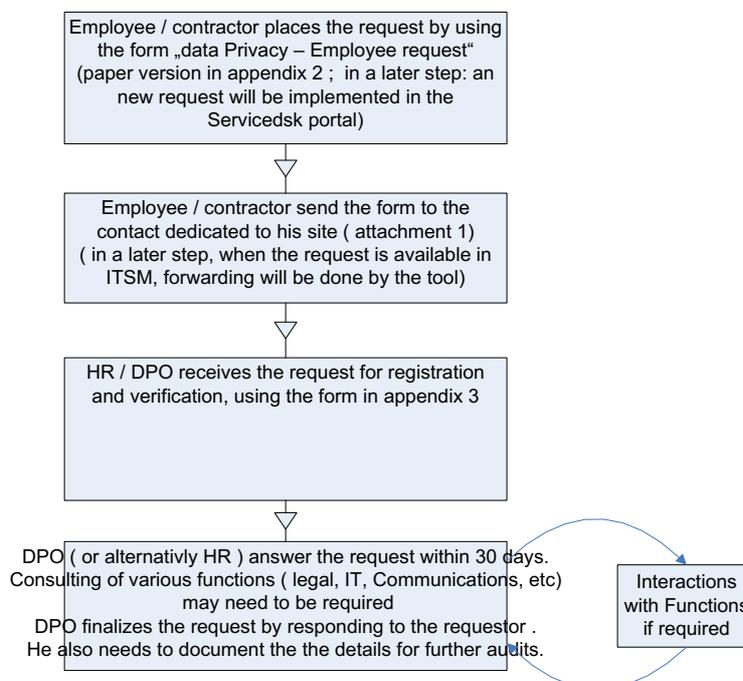
The DPO (or the designated person) will clarify carefully the request, consult the Data Processor or any other relevant person to fullfill the request.

He will also determine required actions (e.g. deleting/modifying data, provide data files, etc) and forward the required actions to the persons who are in charche to fullfill these activities.

He must monitor and document the whole process (appendix 4).

4.2.3. Process flow

Process flow Employee/Contractor request





5 Appendixes:

Appendix 1: contact list:



Constellium

Data privacy - contacts

Data Privacy -- Who to contact for requests

Site	Country	Data Privacy Officer (DPO) <i>(1st contact for Data Privacy matters. In sites without DPO, HR should be contacted)</i>	HR contact	legal entity
Paris	France			
Issoire	France			
Voreppe	France			
Neuf Brisach	France			
Nuit Saint Georges	France			
Montreuil Juigné	France			
Usseil	France			
Landau	Germany	Soenke Suhr, Landau		
Crailsheim	Germany	Soenke Suhr, Landau		
Burg	Germany	Soenke Suhr, Landau		
Singen	Germany	Stefan Wetsch, Singen		
Gottmadingen	Germany	Stefan Wetsch, Singen		
Dahenfeld	Germany	Stefan Wetsch, Singen		
Decin	Czech Republic			
Levice	Slovakia			
Ravenswood	USA			
Muscle Shoals	USA			
White	USA			
Van Buren	USA			
Baltimore	USA			
Kirkland	USA			
New York	USA			
Plymouth	USA			
San Luis Potosi	Mexico			
Milano	Italy			
Amsterdam	Netherlands			
Sierre	Switzerland			
Chippis	Switzerland			
Steg	Switzerland			
Zurich	Switzerland			
Changchun	China			
Seoul	South Korea			
Shanghai	China			
Singapore	Singapore			
Tokyo	Japan			



appendix 1 - data privacy - contacts.xls

[Link to the file](#)



Appendix 2: data privacy – employee request EN [link](#)



Constellium

Data privacy -
Employee request

Request to get Information on my Personal Data in Constellium

I am a(an) *

employee	<input type="checkbox"/>
Customer	<input type="checkbox"/>
Contractor	<input type="checkbox"/>
Other	<input type="checkbox"/>

<input type="checkbox"/>
<input type="checkbox"/>
<input type="checkbox"/>
<input type="checkbox"/>

Select request Type(s)*

Update data	<input type="checkbox"/>
Info request	<input type="checkbox"/>
data deletion	<input type="checkbox"/>
Object to processing	<input type="checkbox"/>
File a complaint	<input type="checkbox"/>
review automated decision	<input type="checkbox"/>
data portability	<input type="checkbox"/>
restrict processing	<input type="checkbox"/>
other (please explain)	<input type="checkbox"/>

<input type="checkbox"/>

Name (Last name, first name)*

Email*

Site / Country*

Request details*

Please enter a detailed description of the request

* mandatory



Appendix 3: data privacy – data subject request (part 1) Form

To be filled out by the person who receives the request (DPO or HR) [link](#)

reference number	
------------------	--

date:	
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1. Data Subject Details

first name	last name

Type of data subject (tick the box)

Customer	<input type="checkbox"/>
Employee	<input type="checkbox"/>
Contractor	<input type="checkbox"/>
Other	<input type="checkbox"/>

Comments

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How was the identity of the requestor verified? (please explain)

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How can the data subject be contacted?

E-mail	<input type="checkbox"/>
Phone	<input type="checkbox"/>
Mail	<input type="checkbox"/>
Online Portal	<input type="checkbox"/>
Other	<input type="checkbox"/>
Not Sure	<input type="checkbox"/>

Comments

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2. Request details

Who received the request?

Please enter recipient's name, job title and contact information

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When was the request received?

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How was the request made/received?

Select all that apply:

E-mail	<input type="checkbox"/>
Phone	<input type="checkbox"/>
Web Form	<input type="checkbox"/>
SMS	<input type="checkbox"/>
Mail	<input type="checkbox"/>
Other	<input type="checkbox"/>
Not Sure	<input type="checkbox"/>

Comments

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Describe the request.

Please enter a detailed description of the request and any additional information provided by the data subject.

Include attachments (e.g. screenshots).

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Appendix 4: GDPR data subject Request (part 2 - to be filled out by the data privacy office) [link](#)

Privacy Office Review

reference number	
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date:	
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Section 1

Is Constellium the Controller or the Processor of the data subject's personal data?

Controller	<input type="checkbox"/>
Processor	<input type="checkbox"/>

Comments

Under Articles 12-22 of the GDPR, controllers have specific obligations regarding data subject rights; and, under Article 28 data processors must assist controllers with the fulfillment of those obligations

Is there any doubt as to the data subject's identity?

Yes	<input type="checkbox"/>
No	<input type="checkbox"/>
Not sure	<input type="checkbox"/>

Comments

Verify the identity of the data subject and attach evidence of the verification.

enter your answer here

Under Article 12(6) of the GDPR, where a controller has reasonable doubts concerning the identity of the natural person making the request, the controller may request the provision of additional information necessary to confirm the identify of the data subject.

How can the data subject be contacted?

E-mail	<input type="checkbox"/>
Phone	<input type="checkbox"/>
Mail	<input type="checkbox"/>
Online Portal	<input type="checkbox"/>
Other	<input type="checkbox"/>
Not Sure	<input type="checkbox"/>

Comments

Did you decide to fulfill the request?

Yes	<input type="checkbox"/>
No	<input type="checkbox"/>
Not sure	<input type="checkbox"/>

Comments



Why did you decide not to fulfill the request?

Select all that apply:

Unable to identify the data subject	<input type="checkbox"/>
The request is manifestly unfounded	<input type="checkbox"/>
The request is excessive	<input type="checkbox"/>
Invalid request	<input type="checkbox"/>
Other	<input type="checkbox"/>
Not Sure	<input type="checkbox"/>

Justify your answer:

Contact the proper employee(s) to assist in fulfilling the request, and attach evidence.

Include correspondence with the employee(s), a log of deletion if applicable, etc.. Enter your answer here:

Has anyone responded to the data subject?

Yes	<input type="checkbox"/>
No	<input type="checkbox"/>
Not sure	<input type="checkbox"/>
not applicable	<input type="checkbox"/>

Please attach evidence of the response and save copies of the communication for your records.

Information must be provided on action taken on a request to the data subject without undue delay and in any event within one month of receipt of the request.

That period may be extended by two further months where necessary, taking into account the complexity and number of the requests. (Article 12(3))

When was the response sent?

Select all that apply:

Without delay and within 1 month of receipt	<input type="checkbox"/>
With delay, but within 1 month of receipt	<input type="checkbox"/>
Over 1 month (invalid extension, and data subject not informed)	<input type="checkbox"/>
Over 1 month (valid extension, and data subject informed)	<input type="checkbox"/>
Over 2 months (invalid extension, and data subject not informed)	<input type="checkbox"/>
Over 2 months (valid extension, and data subject informed)	<input type="checkbox"/>
Other	<input type="checkbox"/>
Not Sure	<input type="checkbox"/>

enter date and justification here

Additional Information



6 Document Revision

Author	Version	Date	Change	Approval
Dieter Knobelspies	1.0	19/04/2018	Initial version Storage location	