

Revisions

Version	Date	Author	Changes Made (*)
2018-v1	11 May 2020	Data Protection Officer	Initial version
2022-v1	1 July 2022	Data Protection Officer	Removed DDY as processor, updated DDY branding, minor updates, added compliance section

(*) All changes are marked in grey highlight.

The Regulation (EU) 2016/679 - General Data Protection Regulation (GDPR) defines the rights of the data subject. A data subject is a natural person whose personal data is processed. In articles 15 to article 22, the rights of the data subject are defined.

The data subject has to right to:

- * Access to personal data (article 15)
- * Rectification of personal data (article 16)
- * Erasure of personal data (article 17)
- * Restriction of processing (article 18)
- * Notification in case of rectification, erasure and restriction of processing (article 19)
- * Portability of personal data (article 20)
- * Object to process personal data (article 21)
- * Not to be subject of automated processing including profiling (article 22)

Digidentity processes personal data based on a contractual agreement between the data subject (customers) and Digidentity (controller). Based on the processing of personal data in the contract, the rights defined in article 18 (restriction), portability (article 20), objection (article 21) are not applicable as Digidentity cannot provide the service as defined in the contract. Digidentity does use automated processing when customer register for a service but does not use automated processing for purposes such as profiling.

In this document, the procedure for the data subject rights for access, rectification and erasure is defined.

Right to access personal data

The data subject has the right to access their own personal data that Digidentity processes. The data subject is able to access personal data in their account. The data subject should log into their account (my.digidentity.eu) or in the Digidentity Identity Wallet (mobile app) with two factor authentication. The process of logging in with second factor authenticator provides Digidentity a level of assurance that the access request is by the rightful data subject. The account shows all personal data processed by Digidentity.

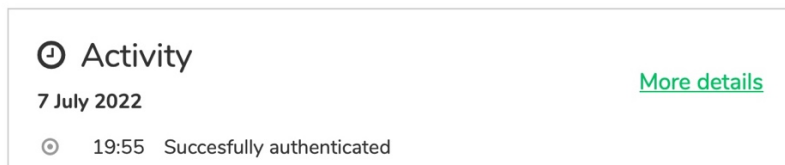
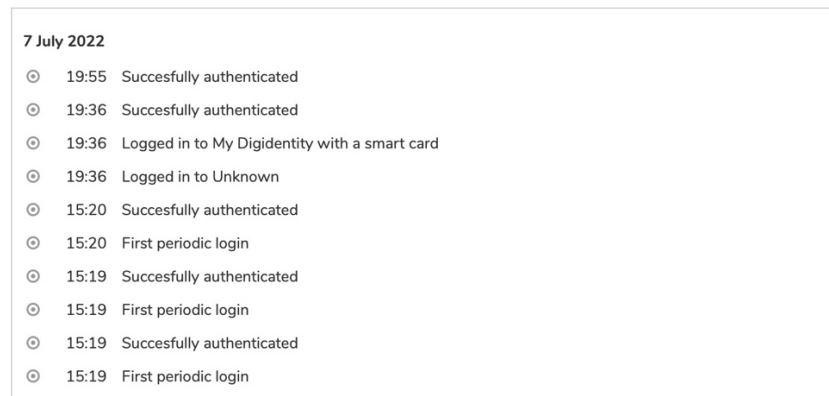


Figure 1 - Account Activity - More details

Activity Details

Details of your latest account activity

On this page you can see the recent activity of your account. If there is activity on your account that you do not recognise, please report it to [our service desk](#) immediately. You can download this data for your own administration. If you require more information on the data that we store, please see [Privacy Policy](#) or contact us at [privacy](#).



[Next](#)

[Download details](#)

Figure 2 - Activity Details - Download details

A download function is available in my.digidentity.eu for the data subject to download all personal data in a [.html](#) file. The generated [.html](#) file will be download via a secure channel to the data subject.

Right to rectification of personal data

The data subject has to right to rectify their own personal data. The data subject is able to rectify personal data in their profile. The data subject should log into their profile (my.digidentity.eu) with two factor authentication. The process of logging in with second factor authenticator provides Digidentity a level of assurance that the rectification request is by the rightful data subject. The profile shows all personal data processed by Digidentity.

The data subject is able to rectify personal data in their profile. Digidentity will request evidence of rectified data to verify the data is correct and valid. This could result in reidentification of the data subject to verify updated personal data.

A notification of the rectification will be sent to the email address in the data subject profile (defined in GDPR article 19).

Right to erasure of personal data (right to be forgotten)

The data subject has to right to erase their own personal data. The data subject is able to erase personal data in their account. The data subject should log into their account (my.digidentity.eu) with two factor authentication. The process of logging in with second factor authenticator provides Digidentity a level of assurance that the deletion request is by the rightful data subject.

A delete function is available for the data subject to delete the account and all personal data held by Digidentity (retention period permitting). Pressing the delete button in the account will require an authentication to confirm deletion and log the request in our systems. A notification will be sent to the data subject confirming deletion of the personal data (after which the email address is deleted) (defined in GDPR article 19).

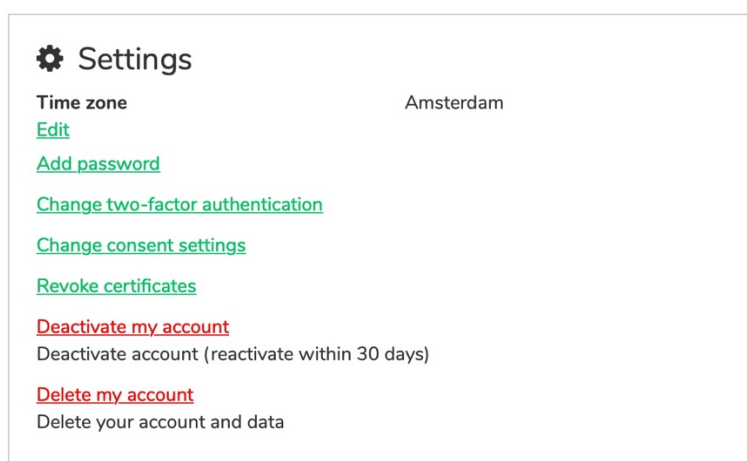


Figure 3 - Delete account option in my.digidentity.eu

GDPR Compliance

Didentity has implemented technical and organisational controls to protect personal data of customers. In case of an incident, the account holder will be informed. Didentity is audited annually by independent auditors and government supervisory bodies to verify compliance to GDPR.

Didentity protects personal data and has implemented a management system for security and privacy which has been certified against ISO27001:2013, ISO27017:2015, ISO27018:2019 and IS27701:2019.

Didentity is Privacy (GDPR) Certified by ICT Recht (www.ictrecht.nl). ICT Recht is an independent legal advisory firm specialised in privacy law and regulations (www.privacyverified.nl/en/company-certification/).

