



Data Subject Access Right Policy and Procedure

Data Subjects Rights

Individuals referred to as “Data Subjects” have several rights under the European Union (EU) General Data Protection Regulation (Regulation 2016/679, “GDPR”), which they can exercise in particular circumstances. These are:

- The right to access data about them (“personal data”)
- The right to rectify/correct their personal data
- The right to erase/delete their personal data (the “right to be forgotten”)
- The right to “port” their personal data from one organisation to another
- The right to restrict the processing of their personal data
- The right to object to processing of their personal data

Objective of the Policy

This policy sets-out the procedure that ECOO will follow in case of a Data Subject wishing to make use of their rights as provided for by the GDPR.

Timeframe

This policy and procedure was put in place on 25 May 2018. The policy was reviewed in May 2021 and in June 2025. The next review will take place by the end of 2028.

Procedure

- **Data Subjects who wish to access their personal data held by ECOO**

Data Subjects should send an e-mail to the ECOO Secretary General setting out their request. The request will be followed-up without undue delay. The data held by ECOO are in electronic format and will be shared with the requesting party electronically. In case of repeated requests that are made at unreasonably frequent intervals, ECOO will assess the reason for these requests and seek to address the situation with the Data Subject. ECOO reserves its right to only provide any information that has changed since the last request.

- **Data Subjects who wish to rectify/correct their personal data**

Data Subjects should send an e-mail to the ECOO Secretary General indicating the changes they wish to make to their personal data. The request will be followed-up without undue delay and confirmation of completion will be sent to the Data Subject or clarify any questions before making the changes.

- **Data Subjects who wish to exercise their right to be forgotten**

Data Subjects should send an e-mail to the ECOO Secretary General expressing their wish to exercise their right to be forgotten. The Secretary General or Secretariat will follow-up on this request without



undue delay. The request will be assessed in view of the legal basis on which the data has been obtained.

In case of the applicable legal basis being “consent” the right to be forgotten will apply without undue delay.

In case of the applicable legal basis being “legitimate interest” the request will be assessed by the Secretary General and if needed by the ECOO Executive Committee. If an existing ECOO member (national association) wishes to be forgotten, the membership status will first have to be clarified and in full respect of the ECOO Statutes and Rules of Procedure. With regards to the European Diploma in Optometry or the European Qualifications in Optics, ECOO needs to hold a record of who holds these professional qualifications for future verification of validity requests. ECOO may therefore retain the basic information of an alumni including name, year of graduation and educational institution where the qualification has been obtained.

- **Data Subjects who wish to port their personal data from one organisation to another**

Data Subjects should send an e-mail to the ECOO Secretary General expressing their wish to port their personal data, specifying the relevant details to carry out this request. The request will be followed-up without undue delay.

- **Data Subjects who wish to restrict the processing of their personal data**

Data Subjects should send an e-mail to the ECOO Secretary General expressing their wish restrict processing of their personal data. The request should clearly stipulate which data processing activities are to be restricted. The request will be assessed on the basis of the legal basis under which the data has been collected and followed-up without undue delay.

- **Data Subjects who wish to object to processing of their personal data**

Data Subjects should send an e-mail to the ECOO Secretary General expressing their objection to processing of their personal data. The request should clearly stipulate which data processing the objection relates to. The request will be assessed on the basis of the legal basis under which the data has been collected and followed-up without undue delay.

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