

## **MRI Software LLC Data Subject Access Request Appeals Policy**

MRI Software LLC (“MRI”) has formalized an appeal process for United States verifiable consumer requests for access, correction, transfer, deletion, and/or any other applicable privacy right (“Verifiable Consumer Request”) that have been denied. Consumer inquiries may be submitted to MRI through the [Data Subject Request](#) page on the MRI website, or via email, phone, or post. Generally, MRI is acting in the capacity of a Processor. “Processor” means the natural or legal person, public authority, agency or other body which processes personal data on behalf of a Controller. “Controller” means the natural or legal person which determines (individually or jointly or in common with others) the purposes for which and the manner in which any personal data are or will be processed.

Pursuant to applicable law, consumers may appeal a decision by MRI on a Verifiable Consumer Request where the consumer believes that they were incorrectly denied a legal right to access, correction, deletion, portability, restriction of sale, or other right available to the consumer. A consumer will be provided only those rights available to a consumer under the applicable law. Where MRI is acting solely in the role of a Processor, MRI will always refer the consumer to the Controller – generally, MRI’s client with whom the consumer maintains a relationship.

### **Verifiable Consumer Requests shall be reviewed as follows:**

1. A Verifiable Consumer Request is received by MRI.
2. A member of the MRI data privacy team reviews the Verifiable Consumer Request and requests additional information from the consumer, as necessary.
3. Based upon the residency information provided by the consumer, the MRI data privacy team member may be able to make an initial decision of denial.
4. Where the consumer resides in a state that provides specific rights of access, correction, transfer, deletion, and/or any other applicable privacy right, the MRI data privacy team member will first search its customer relationship management (CRM) platform and then will connect with its product departments to conduct a search of the applicable systems, as necessary.
  - a. If that search returns results that match the information provided in the Verifiable Consumer Request, the MRI data privacy team member will, as appropriate, work with the consumer to verify the individual’s identity. The verification process will look different based upon the information already provided, the action desired by the consumer, and the relative harm that could result if the action were taken for the incorrect consumer.
    - i. Once the consumer has been verified, MRI will provide the level of information that is appropriate based upon the individual’s residency status and MRI’s position in the data flow.
      1. Where MRI is the Processor, this communication will notify the consumer that they should work with their employer/landlord/etc. that directly engages MRI in order to action their request.
      2. Where MRI is the Controller, this communication will notify the consumer on whether the Verifiable Consumer Request has been actioned and on what grounds it was approved or denied.
    - b. If the search does not return results, the MRI data privacy team member will notify the consumer that no such information resides in any of MRI’s systems.

### **Verifiable Consumer Requests that have been denied shall be appealed as follows:**

1. Upon receipt of a denial from the MRI data privacy team member, a consumer may elect to appeal the decision. Appeals will only be reviewed by MRI where the individual is entitled to an appeal.
2. Appeals may be submitted through the [Data Subject Request](#) page on the MRI website, or via email, phone, or post. The individual should indicate that the submission is an appeal.
3. Upon receipt of an appeal, the Vice President of Compliance or their designee will review the appeal and make a final determination based upon:
  - a. The residency status of the consumer;
  - b. The relevant law applicable to the consumer; and
  - c. The information held by MRI in its capacity as Controller and in its capacity as Processor.
4. The Vice President of Compliance or their designee will respond to the consumer via email within 30 calendar days of receipt of the appeal.
5. A determination by the Vice President of Compliance or their designee will be considered final.