

**Glemnet Ltd**  
**Data Subject Consent Procedure DP003**

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## **1. Scope**

This procedure covers all situations where Glemnet Ltd requires the consent of a data subject for the processing of personal data.

Consent is defined as any indication on the part of the data subject that he or she agrees that their personal data may be processed. Consent must be given freely, without any duress, it must be specific, informed and without ambiguity and shall be granted by the data subject either by way of a statement or through clear, affirmative action on his or her part.

## **2. Responsibilities**

As a data controller, Glemnet Ltd is responsible for obtaining the consent of the data subject, under the oversight of the Data Protection Officer (“DPO”).

## **3. Consent procedure**

Glemnet Ltd must demonstrate that explicit consent has been given for the processing of a data subject’s personal data. This is done via a Data Subject Consent Form DP004.

The specific purpose or purposes of the processing must be set out in the Data Subject Consent Form and the data subject must expressly consent to this.

Glemnet Ltd must be able to demonstrate the following:

- That the consent of the data subject is easily distinguishable from all other data held on the data subject (i.e. it is easy to locate and identify);
- That the consent of the data subject is made in an intelligible manner, using clear and plain language;
- That, prior to giving consent, the data subject has been informed of his or her rights to withdraw consent, as per the Right to Withdraw Consent Procedure DP005; and
- That the processing of personal data can only take place pursuant to the agreement between Glemnet Ltd and the data subject, whereby the data subject provides his or her explicit consent.

#### **4. Child consent procedure**

In relation to the processing of personal data of children under the age of 16, Glemnet Ltd requires additional consent from the person who has parental responsibility over the child and Glemnet Ltd must be able to demonstrate that this additional consent has been provided, as per Parental Consent Form 92017-L and that it has taken reasonable efforts to ensure that the claim of parental responsibility is authentic and true, including the use of available technology.

#### **5. Document owner**

The Data Controller is the owner of this policy document and must ensure that it is periodically reviewed according to the review requirements contained herein.

The latest version of this policy document dated 4<sup>th</sup> March 2023 is available on the website of Glemnet Ltd can also be accessed by Glemnet staff in SharePoint.

This policy document was approved by Glemnet Ltd's Board of Directors and is issued by the Managing Director on a version controlled basis.

Name of Managing Director: Neil Linter

Date: 4<sup>th</sup> March 2023

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