

Personally Identifiable information Removal Request Policy

Purpose

Tigunia is committed to the privacy and protection of personal data. As part of our commitment, we have established this Personally Identifiable Information (“PII”) Removal Request Policy to outline the process by which individuals can request the deletion of their personal data held by us, and how we respond to such requests.

Scope

This policy applies to all personal data processed by Tigunia in relation to data subjects within the European Economic Area (“EEA”), in compliance with GDPR Article 17 (Right to Erasure or "Right to be Forgotten"). Tigunia will respond as described in this policy for any PII removal request, regardless of region.

Roles and Responsibilities

James Nicholas - V.P., I.T. - Data Privacy Officer
David Stocker - V.P., Client Services and Legal Affairs

Policy

Tigunia provides individuals with the ability to request the erasure of their personal data when:

- The data is no longer necessary for the purpose for which it was collected or processed.
- The data subject withdraws consent and there is no other legal basis for processing.
- The data subject objects to the processing, and there are no overriding legitimate grounds for processing.
- The personal data was unlawfully processed.
- The personal data must be erased to comply with a legal obligation.

Procedure for Submitting a Data Removal Request

Data subjects can submit a request for data removal by contacting Tigunia via email to privacy@tigunia.com or by mail to:

Data Privacy Officer
Tigunia, LLC
P.O. Box 31014
Edmond, OK 31014

All requests must include the following information:

- Full name of the data subject.
- Contact information (email address, phone number).
- A clear statement requesting the deletion of personal data.
- Any specific details about the data being requested for deletion, if applicable.

Verification of Identity

Before processing any request, Tigunia will take reasonable steps to verify the identity of the requester. This may involve:

- Requesting additional information (such as proof of identity) if necessary.
- Ensuring that the individual making the request is the data subject or an authorized representative.

Response Timeline

Upon receiving a valid data removal request, Tigunia will:

- Acknowledge receipt of the request within 5 business days.
- Respond within 45 days.
- If Tigunia cannot comply with the request, we will provide a clear explanation of the reasons, such as legal obligations or overriding legitimate interests.

Third-Party Data Sharing

If the personal data has been shared with third parties, Tigunia will take reasonable steps to inform those third parties of the data removal request, unless this proves impossible or involves disproportionate effort.

Exceptions to Data Removal

There are specific circumstances where Tigunia may not be required to comply with a data removal request, such as when data processing is necessary for:

- Exercising the right of freedom of expression and information.
- Compliance with a legal obligation or for the performance of a task carried out in the public interest.
- Establishment, exercise, or defense of legal claims.

In such cases, the data subject will be informed of the reasons for denial.

Record Keeping

Tigunia will maintain a record of all data removal requests and our responses to ensure transparency and accountability in handling personal data.

Updates to This Policy

Tigunia may update this Data Removal Request Policy from time to time to reflect changes in legal or regulatory obligations or our internal procedures. Any changes will be communicated through our website or other appropriate channels.

For further information, please contact our Data Privacy Officer (“DPO”) via email to privacy@tigunia.com.