

# **Privacy Rights Appeal Process**

There may be times when an individual disagrees with a decision made by our organization in the application and/or interpretation of data privacy law with regard to honoring privacy rights requests. This appeals process is designed to provide a way for the individual to appeal decisions and allow our organization an opportunity to reevaluate past decisions.

## **Guidelines**

### Informal Resolution

If our organization makes a decision on a privacy rights request with which an individual disagrees, that individual is encouraged to discuss the issue with our privacy team in order to resolve the matter. The privacy team will consider the individual's perspective and make efforts to resolve any issues informally while abiding by company policies and applicable law.

### Initiating the Appeal Process

If the matter cannot be resolved informally, or if the individual chooses to appeal without discussing the issue informally with us, then the appeal procedure may be initiated by giving written notice to [dispute@floridianexpress.com](mailto:dispute@floridianexpress.com) outlining the dispute and the reasons for it. The notice should include any accompanying documentation necessary to evidence the claims being made.

### Acknowledgement

We will acknowledge receipt of the appeal within 10 business days. This acknowledgement may contain requests for additional information as necessary to help our organization properly investigate or adjudicate the appeal. Your failure to provide substantive responses to our requests may materially impact our ability to investigate or adjudicate the relevant issue.

### Investigation and Determination

We will reasonably investigate the appeal based on the information and documentation provided. Following the investigation, our organization will make a determination of the appeal, which may include modifying or upholding the original decision. We will notify the individual of our determination in writing within 60 days of receipt of any appeal. Such notice will include an explanation of the reasoning for the decision. If we deny the appeal, the individual may file an appeal with the applicable regulator based on their residency.

## **Other Considerations**

### Scope of Appeal

The appeal is intended to review whether or not a decision made by the Privacy Team regarding data privacy rights was fair and consistent with applicable privacy law. Individuals may only appeal a decision that applies to him/her personally unless the person is otherwise authorized to act on the individual's behalf.

The appeal will focus exclusively on the decision under appeal. Broader issues related to the organization's policies, management style, or any other such issues will not be considered as part of the appeal.

### Remedy

The remedy that an individual seeks is an important part of the appeal. The initial written appeal must address what the individual seeks as an outcome (*i.e.*, access to data, correction of data, deletion of data, etc.).

### Withdrawal of Appeal

An individual who has filed an appeal may withdraw or end the appeal at any time by providing written notice of withdrawal to [dispute@floridianexpress.com](mailto:dispute@floridianexpress.com).

### Discrimination

Discrimination is strictly prohibited against any person who in good faith initiates an appeal.

### Appeal Records

A record of the appeal, including the final determination, will be maintained by our organization in accordance with our record retention policies and procedures.