



## Policy: Data Request

Department: IT

Date: Approved October 2016

Review Date: January 2018

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### 1.0 Purpose

110% Ltd would like to share with our user community, as well as those who may be contemplating asking 110% Ltd to disclose user data, our policies on responding to such requests:

### 2.0 Scope

This policy applies to:

- All requests to 110% Ltd requesting disclosure of user data.

### 3.0 Key principles

1. Because 110% Ltd is a service provider to other businesses, requests for user data should be referred in the first instance to a Team Owner or administrator. If you send a data request to 110% Ltd and the data is accessible to the team or user, we will start by forwarding your request so it's best to start there first.
2. 110% Ltd provides prior notice to impacted users when legal process is received in criminal or civil matters and such disclosure is not specifically prohibited by law or where 110% Ltd determines in its sole discretion that providing notice could create a risk of harm to specific people, to children or to 110% Ltd.'s rights and property interests including the security of its network.
3. 110% Ltd requires that any individual issuing legal process to 110% Ltd properly domesticate the process and serve 110% Ltd in a jurisdiction where it is resident or has a registered agent to accept service on its behalf.
4. 110% Ltd does not accept legal process directly from law enforcement entities outside the U.K. Foreign law enforcement agencies should proceed through a Mutual Legal Assistance Treaty or other diplomatic or legal means to obtain data through a court where 110% Ltd is located. 110% Ltd responds to legal process in a manner consistent with the Electronic Communications Privacy Act 2000 and relevant case law. 110% Ltd does not disclose account content absent a search warrant in criminal cases. In civil cases, 110% Ltd cannot disclose content without sufficient legal process and the consent of the appropriate 110% Ltd customer(s).
5. For more information on the types of data that 110% Ltd collects and for how long such data is retained, please see: <https://110percent.io/media/privacy-policy>

6. Content removal requests should be directed to administrators. As described in 110% Ltd.'s Terms of Service, there are certain limitations on the appropriate use of 110% Ltd and 110% Ltd reserves the right to remove content that violates its policies. However, these decisions are better made in most cases by the Administrators rather than 110% Ltd. 110% Ltd does remove images involving sexual exploitation of children and report such images to the National Crime Agency, Child Exploitation and Online Protection Command. 110% Ltd publishes a Transparency Report summarizing user data requests and content take down requests.

#### **4.0 Monitoring and auditing**

This policy and its implementation will be subject to internal monitoring and auditing throughout the 110% Ltd, and the outcomes from these processes will inform and improve practices as part of a commitment to continual improvement. 110% Ltd will also undertake appropriate benchmarking and external auditing exercises.

#### **5.0 Associated documents**

Please refer to:

- [Data Protection Act 1998](#)
- [Freedom of Information Act 2000](#)
- [Freedom of Information Policy](#)
- [Staff Privacy Notice](#)
- [Client Privacy Notice](#)
- [Personal Data Request procedures](#)
- [Data Retention and Archiving Policy](#)

#### **6.0 Review of policy**

This policy will be reviewed at least every two years or when there are significant changes to it.

#### **7.0 Contact list for queries related to this policy**

Data Protection Officer

Chief Information Officer

#### **8.0 Authority for this policy**

Senior Management Team