

# Data Subject Access Request (DSAR) Policy

**Version:** 1.0

**Last Updated:** October 2025

**Approved By:** Data Protection Officer (DPO)\*\*

**Next Review Date:** October 2026

## 1. Purpose

Orbitel.ai respects individuals' rights to access, correct, or delete their personal data as granted under the **Digital Personal Data Protection Act (DPDP) 2023**, the **General Data Protection Regulation (GDPR)**, and similar global privacy frameworks.

This policy outlines Orbitel's process for handling Data Subject Access Requests (DSARs) transparently, securely, and within prescribed timelines.

## 2. Scope

Applies to:

- All personal data processed by Orbitel Labs Pvt. Ltd. in connection with its AI and SaaS products, websites, and communications.
- Data subjects including Orbitel customers, partners, employees, and website visitors.

## 3. Rights of Data Subjects

Under applicable laws, data subjects may:

- Request confirmation whether Orbitel processes their personal data.
- Obtain a copy of their data in a structured, commonly used, and machine-readable format.
- Request correction of inaccurate or incomplete information.
- Request deletion of data (subject to legal or contractual obligations).

- Restrict or object to specific processing activities.
- Withdraw consent at any time where processing is based on consent.

#### **4. Request Submission and Verification**

- DSARs must be submitted via [privacy@orbitel.ai](mailto:privacy@orbitel.ai) with the subject line “Data Request.”
- Orbitel may request additional information to verify the requester’s identity to prevent unauthorized disclosure.
- Requests can also be submitted through the **Contact Form** available on Orbitel’s website.

#### **5. Processing and Response Timelines**

- Orbitel acknowledges DSARs within **7 working days** (as per DPDP).
- Responses are provided within **30 calendar days**, unless complex cases require an extension (communicated in writing).
- If the request is unfounded, repetitive, or excessive, Orbitel may charge a reasonable administrative fee or refuse to act, with justification provided.

#### **6. Exemptions**

Orbitel may deny or limit access to data when:

- Disclosure would infringe on others’ privacy or trade secrets.
- Retention is required for legal, regulatory, or contractual obligations.
- The data has been irreversibly anonymized.

#### **7. Record Keeping**

All DSAR requests and responses are logged, including timestamps, requester identity, actions taken, and response outcomes. These logs are retained for compliance verification.

## **8. Compliance and Continuous Improvement**

The DPO reviews DSAR logs quarterly to identify process improvements.

Orbitel ensures staff handling DSARs are trained on privacy obligations and user rights under applicable laws.