
SUBJECT ACCESS REQUEST POLICY & PROCEDURE



1. Scope

The General Data Protection Regulations (GDPR) provides data subjects with rights in connection to personal data held about them. It provides those data subjects a right of access to that data, subject to the rights of third parties and the satisfaction of a number of criteria. This procedure defines the process to be followed when a request for access to personal data 'Subject Access Request' or 'SAR' is received.

All personal data processed by PharmaCare (Europe) Limited is within the scope of this procedure.

Data subjects are entitled to request:

- Confirmation as to whether PharmaCare (Europe) Limited is processing any personal data about that individual;
- Access to their personal data;
- Any related information must be processed fairly, lawfully and in a transparent manner
- Processed for specific, legitimate and lawful purposes
- Adequate, relevant and not excessive
- Accurate and up to date
- Not kept for longer than necessary
- Processed in line with an individual's rights
- Secure
- Not transferred other than in accordance with agreed terms and conditions

2. Responsibilities

- 2.1 The HR & Privacy Officer is responsible for the application and effective working of this procedure, and for reporting to the General Manager, Head of Sales, Head of Finance and Head of Warehouse on Subject Access Requests (SARs).
- 2.2 The HR & Privacy Officer is responsible for handling all SARs.

3. Procedure

- 3.1 Subject Access Requests are made using the Subject Access Request form. These are found on the T: drive within the GDPR Folder. Requests should be sent electronically to The HR & Privacy Officer at dp@pharmacareeurope.com. Any requests in writing should be sent to The HR & Privacy Officer at PharmaCare (Europe) Limited, Unit 3 Dialog, Fleming Way, Crawley, RH10 9NQ.
- 3.2 The data subject provides PharmaCare (Europe) Limited with evidence of their identity, in the form of [*a current passport/driving licence etc*], and the signature on the identity must be cross-checked to that on the application form Subject Access Request.
- 3.3 You are entitled to be given confirmation as to whether we hold or process your personal information, and if so you are entitled to access all your personal information as well as details of:
 - The purposes for which we process your personal data;
 - The categories of your personal data we process;
 - The recipients, or categories or recipient to whom personal data has been or will be disclosed, in particular recipients in third countries or who are international organisations;
 - How long we expect to store your data;
 - Where you did not give us the personal data, the source from which we collected the personal data; and
 - Whether we use any automated decision making in relation to the processing of your personal data.

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- 3.4 PharmaCare (Europe) Limited records the date that the identification checks were conducted, and the specification of the data sought on the Subject Access Request Register, held by the HR & Privacy Officer.
- 3.5 PharmaCare (Europe) Limited provides the requested information to the data subject within one month 30 days from this recorded date.
- 3.6 Once received, the Subject Access Request (SAR) application is immediately forwarded to the HR & Privacy Officer, who will ensure that the requested data is collected within the specified time frame in clause 3.4 above.
Collection entails:
 - 3.6.1 Collecting the data specified by the data subject, or
 - 3.6.2 Searching all databases and all relevant filing systems (manual files) in PharmaCare (Europe) Limited, including all back up and archived files (computerised or manual) and all email folders and archives. The HR & Privacy Officer maintains a data map that identifies where all data in PharmaCare (Europe) Limited is stored in a secured password encrypted file.
- 3.7 The HR & Privacy Officer maintains a record of requests for data and of its receipt, including dates secured password encrypted file.
- 3.8 The HR & Privacy Officer reviews all documents that have been provided to identify whether any third parties are present in it, and either removes the identifying third party information from the documentation or obtains written consent from the third party for their identity to be revealed.
- 3.9 In the event that a data subject requests PharmaCare (Europe) Limited to provide them with the personal data stored by the controller/processor, then PharmaCare (Europe) Limited will provide the data subject with the requested information in electronic format, unless otherwise specified.
- 3.10 In the event that a data subject requests the scope of the processing of their personal data, PharmaCare (Europe) Limited provides the data subject with the following information:
 - 3.10.1 Purpose of the processing
 - 3.10.2 Categories of personal data
 - 3.10.3 Recipient(s) of the information, including recipients in third countries or international organisations.
 - 3.10.4 How long the personal data will be stored
 - 3.10.5 The data subject's right to request rectification or erasure, restriction or objection, relative to their personal data being processed.
 - 3.10.5.1 PharmaCare (Europe) Limited removes personal data from systems and processing operations as soon as a request for erasure has been submitted by the data subject PharmaCare (Europe) Limited contacts and communicates by email with other organisations, where the personal data of the data subject is being processed, to cease processing information at the request of the data subject.
 - 3.10.6 Inform the data subject of their right to lodge a complaint with the supervisory authority and a method to do so.
 - 3.10.7 Information on the source of the personal data if it hasn't been collected from the data subject.
 - 3.10.8 Inform the data subject of any automated decision-making.
 - 3.10.9 If and where personal data has been transferred and information on any safeguards in place.
- 3.11 PharmaCare (Europe) Limited requires all SARs to be made in writing using the Subject Access Request form and will use the following electronic formats to respond to SARs:
 - By Electronic Mail

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Document Owner and Approval

The HR & Privacy Officer is the owner of this document and is responsible for ensuring that this procedure is reviewed in line with the review requirements of the GDPR.

A current version of this document is available to all members of staff on the *T Drive within the GDPR folder* and is published 24 July 2018.

This procedure was approved by the Head of Sales on 24 July 2018 and is issued on a version controlled basis under his signature.

Signature:

Date:

Change History Record

Issue	Description of Change	Approval	Date of Issue
1	Initial issue		

SUBJECT ACCESS REQUEST



SUBJECT ACCESS REQUEST.

This form is to be completed fully by persons wishing to make a Subject Access request to Pharmacare (Europe) Ltd. It will not be accepted without a signature of the applicant and 1 identifying document from the list (see bottom of form)

1. DATA SUBJECT DETAILS:

Title	Mr <input type="checkbox"/>	Mrs <input type="checkbox"/>	Miss <input type="checkbox"/>	Ms <input type="checkbox"/>	Other: <input type="checkbox"/>
Surname					
First name(s)					
Current address					
Telephone number:					
Home					
Work					
Mobile					
Email address					
Date of birth					
Details of identification provided to confirm name of data subject:					
Details of data requested:					

SUBJECT ACCESS REQUEST



1.1 DETAILS OF PERSON REQUESTING THE INFORMATION (if not the data subject):

Are you acting on behalf of the data subject with their written or other legal authority?	Yes <input type="checkbox"/> No <input type="checkbox"/>
If 'Yes' please state your relationship with the data subject (e.g. parent, legal guardian or solicitor)	
Please enclose proof that you are legally authorised to obtain this information. Please see below identifying documents accepted.	
Title	Mr <input type="checkbox"/> Mrs <input type="checkbox"/> Miss <input type="checkbox"/> Ms <input type="checkbox"/> Other: <input type="checkbox"/>
Surname	
First name(s)	
Current address	
Telephone number	
Home	
Work	
Mobile	
Email address	

***Copy of Identifying documents accepted;**

Passport
Driving Licence
Birth Certificate
Utility Bill

2. DECLARATION

I,, the undersigned and the person identified in (1) above, hereby request that PharmaCare (Europe) Limited provide me with the data about me identified above.

Signature: _____ Date: _____

SAR form completed by (person requesting information):

I,, the undersigned and the person identified in (1.1) above, hereby request that PharmaCare (Europe) Limited provide me with the data about the data subject identified in (1) above.

Signature: _____ Date: _____

SUBJECT ACCESS REQUEST



Please send your request form with your identification to;

A Saul (HR & Privacy Officer)
Pharmacare (Europe) Limited
Unit 3 Dialog
Fleming Way
Crawley
RH10 9NQ

Email; dp@pharmacareeurope.com