

Objection to Processing Procedure

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Title	Objection to Processing Procedure			
Description	Data Portability Procedure			
Created by	For the management of objections to processing personal information under the GDPR. It defines a process for achieving legislative requirements and ensuring effective and consistent management of requests.			
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Purpose

This procedure provides DE Photo (Franchising) Ltd (referred to as the company here after) with an overarching framework for the management of objections to processing personal information for natural living individuals under the General Data Protection Regulation (GDPR). It defines a process for achieving legislative requirements and ensuring effective and consistent management of requests.

Prerequisites

For this procedure to be followed the following conditions need to be met:

- All parties need to be aware of their roles and responsibilities.
- The following documents need to be current and available to the relevant parties:
 - Data Protection Policy
 - Legitimate Interests Assessment (LIA)
- Any systems/services/devices referenced need to be available to the relevant parties.
- All parties have had the relevant training and the training is current and up to date.
- The data in the information asset register is current and accurate.

Conditions

The request has been made regarding personal information held.

A request contains information to perform validation.

A request contains actionable information.

A request pertains to ongoing processing.

All logs and checks are available to document requests.

Outcomes

Data subject rights are fulfilled

The request and outcomes of the request is logged and stored

Process

Verifying the request sub-process

1. Where a communication has been made it should be considered an access request if:
 - a. The communication has been made on behalf of a data subject.
 - b. There is an objection to the processing of the subject's personal data.

Enacting the request sub-process

This sub-process must be completed within 30 days of receiving the request. Where it seems likely that this will not be the case, the data subject should be contacted and informed within a reasonable timeframe to receive the information regarding the reasons for the delay.

1. Create a folder in:
Dropbox: \GDPR\Documents\File Locations\Objection Processing
with name convention:
[Branch]-[Surname]-[Date]-[Doc Number]
for example HO-Moore-16-05-2018-001
2. The decision made in this sub-process should be verified by the Data Protection Officer (DPO).
3. Where the objection is legitimate, the data subject's details should be removed from the processing that was objected to and a note made in the Information Asset Register. Where the objection is not legitimate, the reasons as to why should be noted and stored in the folder created in step 1 of this sub-process.

Responding to the data subject sub-process

1. Where the objection was made by electronic means, the data subject should be informed of the decision on whether their objection is upheld using the same electronic means. A copy of this communication should be stored in the folder created in step 1 of the "enacting the request" sub-process.
2. Where the objection was made by post, the data subject should be informed of the decision on whether their objection is upheld by post. A copy of this communication and proof of posting should be stored in the folder created in step 1 of the "Enacting the Request" sub-process.

Management and Review

This policy should be reviewed as scheduled once annually unless performance indicators, changes to legislation or the organisation necessitate it.

Last Review Date: 16/05/2018

Next Review Date: 16/05/2019