

Subject Erasure Procedure

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Version Control				
Title	Subject Erasure Procedure			
Description	For the management of requests to erase personal information under the GDPR. It defines a process for achieving legislative requirements and ensuring effective and consistent management of requests			
Created by	Mike Moore			
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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 requests to erase 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)
- All relevant parties need read/write access to the file storage systems.
- All parties have had the relevant training and the training is current and up to date.

Conditions

A request has been made regarding personal information held.

The request contains information to perform erasure/deletion.

The request contains actionable information.

The request pertains to ongoing processing.

All logs and checks are available to document requests.

Outcomes

Data subject rights are fulfilled

Data subject is responded to within 1 month

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 erasure/deletion request if:
 - a. The communication has been made on behalf of a data subject.
 - b. There is a request to erase personal information for that same data subject.
2. Where the communication has been identified as an erasure request, the identity of the data subject must be validated before the request can be handled. The subject should provide official identification which is only to be stored for the duration of the request in:
Dropbox: \GDPR\Documents\File Locations\ID Verification

Enacting the erasure request sub-process

This sub-process must be complete 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 regarding the reasons for the delay.

1. Create a folder in:
Dropbox: \GDPR\Documents\File Locations\Erasing Request
with name convention:
[Branch]-[Surname]-[Date]-[Doc Number]
for example HO-Moore-16-05-2018-001
2. Locate where the information that needs to be erased is stored.
3. Securely erase the information from its source as well as any backup, archived or publicly available copies, and ensure that third parties that process the information do the same.

Responding to the data subject's request sub-process

1. Where the request was made by electronic means, an email must be sent to the subject indicating whether their request was completed and if not provide a legitimate reason why not. A copy of this email is to be saved to the folder created in step one of the Enacting the Request sub-process.
2. Where the request was made by post, a letter should be written, printed and posted to the data subject indicating whether their request was completed and if not provide a legitimate reason why not. Proof of posting is to be stored in the folder created in step one 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