



Information Governance Data Privacy Policy		Version 1.0	
Statement Prepared by:	Statement Approved by:	Date Next Review Due:	1/3/26
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1.0 Overview

1.1 This policy details the Pharmacy Group’s approach to Data Privacy and includes publicly available Privacy Notices issued by the Pharmacy to Data Subjects (Patients).

1.2 The scope of this policy applies to all Data Subject that the Pharmacy may collect, hold and process data on. This list includes, but is not exhaustive:

- Patients
- Staff
- Contractors (including Locums)

2.0 Information collected by the Pharmacy

2.1 The Pharmacy group currently collects and process the following data when dealing with requests for information under the Freedom of Information Act 2000, the Environmental Information Regulations 2004, UK General Data Protection Regulations and the Data Protection Act 2018.

- Name
- Contact information such as your address or email address
- Evidence of your identification, such as your passport, driving licence or utility bills when making a Subject Access Request
- The Pharmacy does not request any special category data such as medical history or criminal convictions, however we recognise individuals may choose to provide special category information when contacting us.



3.0 How the information is obtained

3.1 Most of the personal information the Pharmacy processes is provided to us directly by individuals or other bodies for one of the following reasons:

- All aspects of Community Pharmacy work.
- Investigate complaints or requests for an internal review
- Deal with any requests to action information rights
- Investigate security incidents or reports of a data breach
- We also receive personal information indirectly, from the following sources in the following scenarios:

We may process other categories of personal data, including special category data held by other staff within the Pharmacy, for example when responding to a Subject Access Request or;

When dealing with a request for disclosure from another agency with investigative powers

The information handled by the Pharmacy's Staff may include special category data such as:

- Racial or ethnic origin
- Political opinions
- Religious or philosophical beliefs
- Trade union membership
- Health or medical data
- Sexual orientation
- Criminal Convictions

We do not rely on your consent to process your information, however if you do not provide us with certain details, we may not be able to respond to your request or enquiry in full.

3.2 The Pharmacy collects and use personal information:

- Where it is necessary to meet our legal obligations set out in law
- When we are carrying out a task which is in the public interest which is supported in law
- On the basis of substantial public interest when processing special category data, which will be proportionate to the reasons for processing



The legislation which supports this processing is:

- Freedom of Information Act 2000
- Environmental Information Regulations 2004
- UK GDPR and the Data Protection Act 2018
- Local Government and Transparency Code 2015
- Re-use of Public Sector Information 2015

4.0 What we do with the information

4.1 We use the information that you have given us to manage and administer all aspects of Community Pharmacy work, and for reviews or complaints regarding information requests which are made to us. This includes the logging and monitoring of requests to ensure responses are provided within statutory timescales.

We also use information obtained from other sources to respond to disclosure requests where the law permits.

4.2 We may share this information with the following other organisations where law permits, or it is necessary to do so to complete a request:

- The Information Commissioner's Office
- Service Providers such as IT system or software suppliers
- Professional advisers such as lawyers or auditors
- Agencies with investigative powers such as the Police, other Local Authorities or the Home Office

5.0 How long the Pharmacy keeps information for and how we securely dispose of it after use

5.1 We keep personal information for all aspects of processing by the Pharmacy in line with the Pharmacy's retention schedules and NHS guidance on the storing of personal data.

5.2 We will securely dispose of personal information in line with regulated retention periods.



6.0 How the Pharmacy stores Personal Information

Individual's personal information is securely stored on our systems in electronic format. The servers are based in the UK.

Any personal information held in printed form will be secured stored and handled in accordance with the Pharmacy's policies and procedure on safe handling and data security.

7.0 Individual Data Protection rights

7.1 The law gives individuals a number of rights to control what personal information is used by us and how we can use it.

7.2 Rights may differ depending on the lawful basis for processing personal data.

8.0 Contact Details

8.1 Individuals can request further information about the Pharmacy uses personal information, or they can exercise data rights or complain about the use of personal information, the Pharmacy Data Protection Officer can be contacted:

In writing –

TFR Pharm Ltd
Pembroke Castle Pharmacy
15 Main Street
Pembroke
SA71 4JS

8.2 If individuals are still dissatisfied once the Data Protection Officer has been contacted, there is the right to complain to the ICO.

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113



Individuals have a right to approach the Information Commissioner's Office regarding Information Rights at any time.

The Information Commissioner's Office website for further advice. www.ico.org.uk

9.0 Further Information

9.1 Privacy notices will be updated or revised in line with legislation.

Please read this policy in conjunction with:

- Data Privacy Notice (Pharmacy version)