

IMT MEDICAL TRANSPORT LIMITED – MICRO DATA SET 22 MARCH 2024

This Micro Data is updated with regards the law enforcing processes we are accountable for and from the Information Commissioners Office guidance and rules.

The Guide to Law Enforcement Processing is part of a guide towards Data Protection. It is for those who have day-to-day responsibility for data protection in companies with law enforcement functions.

It explains the data protection regime that applies to those authorities when processing personal data for law enforcement purposes. It covers part 3 of the Data Protection Act 2018 (DPA 2018), which is separate from the UK GDPR regime.

It explains each of the data protection principles, rights and obligations. It summarises the key points you need to know and answers frequently asked questions.

Where relevant, this guide also links to more detailed guidance and other resources, including ICO guidance and relevant European guidance published by the European Data Protection Board (EDPB). EDPB guidelines are no longer directly binding to the UK regime, but are included as a useful reference resource.

What is the UK GDPR?

The UK General Data Protection Regulation (UK GDPR) is part of the data protection landscape that includes the Data Protection Act 2018 (the DPA 2018). The UK GDPR sets out requirements for how organisations such as IMT Medical Transport Limited needs to handle personal data.

The UK GDPR sets out seven key principles:

- Lawfulness, fairness and transparency
- Purpose limitation
- Data minimisation
- Accuracy
- Storage limitation
- Integrity and confidentiality (security)
- Accountability

These principles should lie at the heart of our approach to processing personal data and are covered briefly below, but full guidance must be taken from the ICO website.

(a) processed lawfully, fairly and in a transparent manner in relation to individuals ('lawfulness, fairness and transparency').

(b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes ('purpose limitation').

(c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ('data minimisation').

(d) accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay ('accuracy')

(e) kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals ('storage limitation')

(f) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures ('integrity and confidentiality').

What information does the UK GDPR apply to?

The UK GDPR applies to 'personal data', which means any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier.

There are additional rules in the UK GDPR for organisations processing special category data. This includes information about an individual's health.

Does the GDPR still apply?

On 28 June 2021, the EU approved adequacy decisions for the EU GDPR and the Law Enforcement Directive (LED). This means data can continue to flow as it did before, in the majority of circumstances. Both decisions are expected to last until 27 June 2025.

The General Data Protection Regulation has been kept in UK law as the UK GDPR.

This guidance is aimed at UK businesses who receive data from or have offices in the EU and European Economic Area (EEA). It gives a basic overview of the changes to data protection since the UK left the EU and now has an approved adequacy decision.

The key principles, rights and obligations remain the same. However, there are implications for the rules on transfers of personal data between the UK and the EEA.

The UK GDPR also applies to controllers and processors based outside the UK if their processing activities relate to:

- Offering goods or services to individuals in the UK; or
- Monitoring the behaviour of individuals taking place in the UK.

There are also implications for UK controllers who have an establishment in the EEA, have customers in the EEA, or monitor individuals in the EEA. The EU GDPR still applies to this processing, but the way we interact with European data protection authorities has changed.

The UK GDPR sets out the information IMT Medical should supply and when individuals should be informed.

The information IMT Medical supplies about the processing of personal data must be:

- Concise, transparent, intelligible and easily accessible;
- Written in clear and plain language, particularly if addressed to a child; and
- Free of charge.

The Information Commissioner's Office (ICO)

The ICO are the UK's independent authority created to uphold information rights in the public interest, promote openness in public bodies and data privacy for individuals. IMT Medical Transport Limited is registered with ICO.

The ICO provides free and independent advice on your privacy rights.

You can contact the ICO for advice or log a complaint via the information below (check the website of the ICO for accuracy of this information):

- Website: www.ico.org.uk
- Helpline :0303 123 1113 (local rate – calls to this number cost the same as calls to 01 or 02 numbers). If you're calling from outside the UK, you may not be able to use the 03 number, so please call +44 1625 545 700.
- Normal opening hours are Monday to Friday between 9am and 5pm.

Post:

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

What we have done at IMT Medical?

Accountability: We maintain an up-to-date register of our data processing activities.

Data Security: We have strengthened the protection of personal data in the processes and systems of our Company and have passed our annual ISO 27001 accreditation which provides many responsible actions to support data security. We are NHS Digital accredited.

Privacy Impact Assessments: We have reviewed our data processing activity to safeguard the privacy rights of the data subject.

Transparency: We maintain transparency about how data is processed and convey it in a clear and comprehensive manner.

Compliance: We have appointed a Data Protection Officer to monitor internal compliance, to advise and to inform about DPA and UK GDPR and we have taken advice from our insurers and their solicitors.

To keep people informed: We have published a number of updates on our website about the collection and use of their personal data and our staff undertake annual training on matters of confidentiality and DPA.

To have access: We have ensured that to have access to personal data, all are aware of and are able to verify the lawfulness of the processing of the data.

To rectification: We check and monitor if personal data is inaccurate or incomplete.

To erasure/deletion: Of personal data if a compelling reason for its continued processing is missing (also called 'right to be forgotten').

To restrict (or block) processing of personal data.

To data portability to allow personal data to be easily moved, copied or transferred in a safe and secure way.

To object to persons personal data being used for direct marketing and for the purposes of scientific/historical research (We never provide data to anyone for such use).

To have rights in relation to automated decision making and profiling decisions being made about them.