

The Right for Rectification

Pure Resourcing Solutions Limited

Purpose

This policy outlines Pure Resourcing Solutions (Pure) response to rectification requests under the GDPR 2018.

Definition of the right to rectification

Individuals have the right to have inaccurate personal data rectified. An individual may also be able to have incomplete personal data completed. This may involve Pure providing a supplementary statement of the incomplete data.

This right has close links to the accuracy principle of the GDPR. However, although Pure Resourcing Solutions Limited (Pure) may have already taken steps to ensure that the personal data was accurate when it was obtained, this right imposes a specific obligation to reconsider the accuracy upon request.

How Pure will comply with the rectification request

If Pure receive a request for rectification reasonable steps will be taken to satisfy the organisation that the data is accurate and to rectify the data if necessary. Pure will take into account the arguments and evidence provided by the data subject.

Reasonable steps will depend, in particular, on the nature of the personal data and what it will be used for. It is important that the personal data is accurate and where necessary Pure will take steps to rectify it.

Pure will make a significant effort to rectify inaccurate personal data as the purpose for which Pure collects personal data is for the basis of providing recruitment services. Therefore decisions made will affect an individual or others.

Pure may take into account any steps that have already been taken to verify the accuracy of the data prior to the challenge by the data subject.

Inaccurate data

Determining whether personal data is inaccurate can be more complex if the data refers to a mistake that has subsequently been resolved. Pure may contend that the record of the mistake is, in itself, accurate and should be kept. In such circumstances Pure will ensure the fact that a mistake was made and the correct information will be included in the individuals data.

Pure will considering the accuracy?

An individual has the right to request restriction of the processing of their personal data where they contest its accuracy and Pure are reviewing it. Pure will restrict the processing of the personal data in question whilst the verification of inaccuracy is assessed, whether or not the individual has exercised their right to restriction.

Accurate data

Pure let the individual know if the belief is the personal data is accurate and will notify the individual that no amendments will be made to the data. Pure will explain the decision and



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inform the individual of their right to make a complaint to the ICO or another supervisory authority; and their ability to seek to enforce their rights through a judicial remedy.

Notes will be made on our internal CRM system (RDB ProNet) indicating that the individual challenges the accuracy of the data and the reason(s).

Refusal to comply with a right for rectification

Pure can refuse to comply with a request for rectification if the request is manifestly unfounded or excessive, considering if the request is repetitive.

If Pure believes that a request is manifestly unfounded or excessive Pure will:

- Request a "reasonable fee" to deal with the request; or
- Refuse to deal with the request.

In either case Pure will justify the decision.

The reasonable fee will be based on the administrative costs of complying with the request. If Pure decide to charge a fee the individual will be contacted without undue delay and within one month. Pure will not comply with the request until the fee has been received.

What will happen if Pure refuse to comply with a request for rectification?

Pure will inform the individual without undue delay and within one month of receipt of the request.

Pure will inform the individual about:

- The reason(s) no action is taken;
- The right to make a complaint to the ICO or another supervisory authority; and
- The ability to seek to enforce this right through a judicial remedy

Pure will also provide this information if a fee is due or need additional information to identify the individual.

How to submit a request

An individual can make a request for rectification verbally or in writing. It can also be made to any part of the organisation and does not have to be to a specific person or contact point.

A request does not have to include the phrase 'request for rectification'.

If a request is made verbally a representative from Pure will contact the individual to identify that a valid request has been made.

All Pure employees have been made aware of this right and understand the process required to comply. All requests, specifically verbal are logged centrally in order to comply with the request.

Charges

Under the GDPR Pure are unable to charge fee unless the request is manifestly unfounded or excessive.



Complying with right for erasure

Pure will act upon the request without undue delay and at the latest within one month of receipt.

Pure will calculate the time limit from the day after the request is received until the corresponding calendar date in the next month.

Where time extensions apply

Pure are able to extend the time to respond by a further two months if the request is complex or a number of requests have been received from the individual. Pure will let the individual know without undue delay and within one month of receiving the request and explain why the extension is necessary.

An extension time limit is unlikely to be extended if:

- It is manifestly unfounded or excessive;
- An exemption applies; or
- Pure are requesting proof of identity before considering the request

Confirming an individual's ID

If Pure has doubts about the identity of the person making the request they will ask for more information. However, Pure will only request information that is necessary to confirm who the individual is. Pure will take into account what data is held, the nature of the data, and what it is being used for.

Communication will be sent to the individual without undue delay and within one month confirming that Pure requires more information to confirm their identity.

Pure will not comply with the request until the additional information has been received.

Contact details to make a request

Email: privacy@prs.uk.com

Phone: 01223 209888

Pure Resourcing Solutions, The Workspace, Pioneer Court, Vision Park, Histon, Cambridge, CB24 9PT.

Responsible	Nadia Mullins-Hills, IT & Projects Manager
Accountable	Gill Buchanan, Chief Operating Officer
Informed	All employees, candidates and contacts

