

Subject: Final Request: IPS Privacy Policy Update, GDPR Transparency and Portal DPIA (outstanding since 1 Sept 2025)

From: Alicia Day <A.Day@npa.co.uk>

Date: 03/09/2025, 09:37

To: 'The Reasonable Adjustment' <advocacy@thereasonableadjustment.co.uk>

Dear Kieron,

Thank you for your email regarding IPS Pharma's privacy policy on their website. In order to keep communication with IPS Pharma through their legal representative (myself), I will address any issues with their website with IPS Pharma and will provide you with an update once it has been looked into.

My understanding is, the privacy policy not being updated since May 2018 does not necessarily mean it is not compliant. The website needs to reflect the current practices of IPS Pharma, under UK GDPR. If nothing has changed by way of data practices of processing, then the website is correct.

IPS Pharma may need to refer this matter to their website creator or speak with their IT specialists. It is unlikely that the staff at IPS Pharma have any dealing with the website and the privacy policy.

Thank you for bringing this matter to our attention and, if necessary, updates will be made.

Kind regards,
Alicia

Alicia Day
Solicitor

NPA Insurance
Mallinson House
38-42 St Peter's Street
St Albans
Hertfordshire
AL1 3NP
We care
DDI: 01727 800445
Tel: 01727 858687 **Ext** 3684
Email: a.day@npa.co.uk
Web: www.npainsurance.co.uk

National Pharmacy Association

Web: www.npa.co.uk

Follow the NPA on:



Specialist Coverage Award



This electronic mail and any attachment(s) ("email") has been sent by NPA and/or its associated companies (details as below) and is confidential. Please notify the sender immediately if you are not the intended recipient, delete it and do not disclose, distribute, copy, use or act upon it.

This email and its contents may be monitored or recorded for compliance and other purposes. Unless expressly stated, this is not nor is it intended to be a financial promotion and it is not an invitation, inducement (direct or indirect) or personal recommendation to engage in investment/insurance activity.

National Pharmacy Association Ltd (1281757) Authorised and regulated by the Financial Conduct Authority, NPA Insurance Ltd (64269) Authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority. NPA Services Ltd (303781) Head and registered offices: Mallinson House, 38-42 St. Peters Street, St. Albans, AL1 3NP.

WARNING: Whilst every care has been taken to ensure no viruses are present the recipient should check this email for viruses.

From: The Reasonable Adjustment <advocacy@thereasonableadjustment.co.uk>

Sent: 03 September 2025 05:35

To: info@ips-pharma.com

Cc: Alicia Day <A.Day@npa.co.uk>

Subject: Final Request: IPS Privacy Policy Update, GDPR Transparency and Portal DPIA (outstanding since 1 Sept 2025)

Caution: This is an external email. Please take care when clicking links or opening attachments. When in doubt please contact the IT Department. For more information please see <https://npa.cascadecloud.co.uk/> and under "Documents > Policies > Security Awareness"

Dear IPS Pharma,

I am writing for a comprehensive, written response about IPS's privacy framework. NPA have fixed their broken policy links and Puro have created and linked a privacy policy. IPS have yet to respond to my privacy correspondence, including my formal letter of **1 September 2025** concerning the IPS portal and privacy notice (**Exhibit D**) which set out specific GDPR/PECR questions and a clear deadline.

1) Status of the public privacy notice

Your published privacy notice still displays launch-era language and a **"last updated 25 May 2018"** stamp. In 2025, that is not compatible with Articles 5(2) and 12–14 UK GDPR, especially given the scale of special-category health data you process. Please:

- Provide the **current policy text**, its **last-updated date**, and the **CMS/version history** for the last 12 months.
- Identify the **accountable owner** for policy governance (job title, reporting line) and provide the **DPO or data-protection lead contact**.
- Confirm the **timetable** to update the notice to meet Articles 12–14 (Article 6 lawful bases; Article 9 conditions for health data; retention schedules; data-subject rights; international transfers; DPO/contact details).

2) Cookies and PECR

Your notice still relies on implied consent and legacy trackers. Please confirm:

- A **compliant prior, granular opt-in** mechanism is deployed and **non-essential cookies are blocked** until consent.
- An **accurate cookie inventory** and **consent record approach** are maintained and published (PECR reg. 6; ICO guidance).

3) Controllers, processors, and liability (portal and wider ops)

As requested in Exhibit D, please provide:

- A **controller map** for each processing activity (portal intake, dispensing/specials, logistics, records, payments, analytics).

- Any **Article 26 joint-controller arrangement** summary and the **lead contact** for data subjects.
- Categories of **processors** used (hosting, payments, analytics, comms) and confirmation that **Article 28 DPAs** are in place.
- A clear statement of **who bears legal liability** for GDPR/PECR compliance of the portal and public notices.

4) DPIA, security, and incident handling (portal)

Given large-scale health data collection via the IPS portal, please:

- Confirm a **DPIA** has been completed, with **completion date** and a **high-level risk/controls summary** (Articles 25, 32, 35).
- Describe key **technical and organisational measures** (access controls, encryption, logging, segregation, incident response).
- For the **misdirected payment link** incident already raised, provide the **internal incident reference**, **breach assessment outcome** (Articles 33/34), rationale for any non-notification, **root cause**, and **corrective actions**.

5) International transfers

- Identify any **transfers outside the UK/EEA** (analytics, cloud, comms).
- State the **transfer tool** used (IDTA/SCCs) and confirm completion of a **transfer risk assessment** post-Schrems II.

6) Retention and transparency

- Publish **retention periods** (or ranges) for prescription, portal, and payment records rather than “available on request”.
- Confirm **Records of Processing Activities** are current and provide a dedicated **contact route** (DPO or equivalent).

Deadline, adjustment, and format

- Please provide a **complete, point-by-point written** response by **14:00 BST on Wednesday 10 September 2025**.
- **Written correspondence only** is a reasonable adjustment under the Equality Act 2010 and ensures an accurate record.
- If any item needs longer, state the **specific date** for that item and the **reason**.

Preservation notice

Retain all relevant records, including website **CMS audit trails**, **access logs**, **change approvals**, privacy-notice **versions**, **cookie-consent logs**, **incident logs**, **DPIA drafts/approvals**, **processor contracts**, and **internal communications** related to the above.

Context

For the avoidance of doubt: NPA have fixed policy link issues and Puro have created and linked a privacy policy. IPS have **not** answered Exhibit D or my subsequent privacy requests. I would prefer to resolve this directly. If IPS continue not to engage, I will refer the matter to the ICO with a full evidence pack.

Please **confirm receipt** of this email today.

Regards,

Kieron Jay Holmes

Founder, The Reasonable Adjustment

Lived Experience Advocate, Neurodivergence, Disability, Data Rights

--

The Reasonable Adjustment

An independent advocacy platform politely causing confusion for disorganised institutions, one lawful request at a time.

Lived Experience Advocate | Neurodivergence, Disability, Data Rights

 advocacy@thereasonableadjustment.co.uk

 www.thereasonableadjustment.co.uk

We offer **free peer-led advocacy** to neurodivergent, disabled, and marginalised people who've been mistreated or ignored by the systems meant to support them.