

### Introduction

For the health and safety of the visitors and staff at George Watson's College, we are recording the name and contact details of everyone who enters to support NHS Scotland's efforts in tackling COVID-19. This information will be used to enable NHS Scotland and statutory partners to contact you should you have been on our premises around the same time as someone who has tested positive for coronavirus. Contacting people who might have been exposed to the virus is an important step in stopping the spread.

### 1. Why do we need to collect this data?

As stated above, the purpose for which we are <sup>1</sup>processing your personal data is to assist with NHS Scotland's efforts in tackling the coronavirus public health epidemic. This will involve the gathering and, when necessary, the sharing of information with NHS Scotland and statutory partners. Your data will not be used for any other purpose.

In order to assist in the containment of the virus, we will only share your data when it is requested directly by NHS Scotland and statutory partners. This will only be in the unlikely event there is a cluster of coronavirus cases linked to the school.

For further information on the NHS Scotland Test and Protect strategy please visit the NHS website.[1]

### 2. What data will we collect?

Along with the date and time of your arrival and departure, we will collect the following personal data if applicable:

- your name; and
- contact telephone number.

If you do not have a telephone number, you have the option to provide:

- a postal address; or
- an email address.

### 3. What is our lawful basis for collecting this data?

Under data protection law, GDPR Article 6(1), we have a number of lawful bases that allow us to collect and process personal information. In this case, the lawful basis for processing your data is **'legitimate interests'**.

Broadly speaking **'legitimate interests'** means that we can process your personal information if we have a genuine and legitimate reason **and** we are not harming any of your rights and interests.

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<sup>1</sup> <https://www.informationgovernance.scot.nhs.uk/use-of-your-data-for-track-trace-isolate-tti/>

Our legitimate reason for processing your data is to assist with NHS Scotland's Test and Protect strategy in relation to the coronavirus public health epidemic.

Before sharing any information we will carefully consider and balance any potential impact on you and your rights.

#### 4. How long will we retain the data?

Your personal data will be retained only for the purposes stated in this privacy notice and will be held by us for no more than 3 weeks (21 days).

All personal data will be held and disposed of in a safe and secure manner.

#### 5. Your rights

As defined in the data protection law, GDPR Article(s) 12-23, you have the following rights:

- **The right to be informed** about the collection and use of your personal data. This is outlined above.
- **The right to erasure.** If at any point within the 21 days after your visit you decide you'd like us to delete the personal data you provided, please advise us and we will delete all information related to you.
- **The right to object** to us processing your personal data. If you do so, we will delete all the personal data we hold in relation to you.
- **The right to rectification.** If the information held is in any way incorrect, you can contact the data controller and request that the information be rectified.

In certain circumstances exemptions to these rights may apply. Further information is available on the Information Commissioner's Office website.[2]

#### 6. Do you have a complaint?

If you consider that your personal data has been misused or mishandled by us, you can raise this with the data controller. In this instance, the data controller is the Bursar.

If you remain dissatisfied you can make a complaint to the Information Commissioner, who is an independent regulator. The Information Commissioner can be contacted at:

Information Commissioner's Office Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF, or 0303 123 1113, or casework@ico.org.uk.

Any complaint to the Information Commissioner is without prejudice to your right to seek redress through the courts.

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[1] <https://www.informationgovernance.scot.nhs.uk/use-of-your-data-for-track-trace-isolate-tti/>

[2] <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/exemptions/>