



STAPLEFORD PARK

Stapleford Park Track & Trace Privacy Notice

The information that you provide will be processed in accordance with the General Data Protection Regulation and Data Protection Act 2018. The data controller for this information is Stapleford Park Ltd.

Why we need to process your personal data

The UK is currently experiencing a public health emergency as a result of the coronavirus (COVID-19) pandemic. It is therefore critical that organisations take a range of measures to keep everyone safe. The easing of social and economic lockdown measures following the COVID-19 outbreak is being supported by NHS Test and Trace. The Department of Health and Social Care has asked organisations including Stapleford Park to support this service by keeping a temporary record of our visitors for 21 days. In the event of a local outbreak of the virus this data may be used to assist NHS Test and Trace as needed. This could help contain clusters or outbreaks.

Do I have to provide the information?

The Department for Health and Social Care are clear that this compulsory scheme and at least one person per party visiting our premises is required to provide their details. We strongly encourage all of our customers and visitors to share their details in order to support NHS Test and Trace - this information will only be used where necessary to help stop the spread of COVID-19.

The accuracy of the information provided will be the responsibility of the individual who provides it. Stapleford Park will not verify any visitor's identity for NHS Test and Trace purposes.

We collect and process information about -

- persons visiting Stapleford Park, including for functions, weddings, overnight stays, dining and meetings.
- our employees working at Stapleford Park who have had contact with visitors and guests.

The types of information we hold includes:

Customers and visitors -

- the name of the guest or visitor. If there is more than one person, then we can record the name of the 'lead member' of the group and the number of people in the group
- a contact phone number for each guest or visitor, or for the lead member of a group of people
- date of visit, arrival time and, where possible, departure time
- if a customer will interact with only one member of staff, the name of the assigned staff member will be recorded alongside the name of the customer

Staff -

- the names of staff who work at Stapleford Park
- a contact phone number for each member of staff
- the dates and times that staff are at work

Where possible we will collect this information in advance, where this is not practical it will be collected at the point that visitors/guests enter the premises, or at the point of service if impractical to do so at the



STAPLEFORD PARK

entrance. Recording both arrival and departure times (or estimated departure times) will help reduce the number of customers or staff needing to be contacted by NHS Test and Trace. We recognise, however, that recording departure times will not always be practicable.

We receive information from -

- persons entering Stapleford Park or those who have booked to attend a function, event or meeting at our premises
- our employees

Information Sharing

In the event of a local outbreak of the corona virus names and contact details of visitors to our sites may be provided to the NHS to support Test and Trace work.

NHS Test and Trace will ask for these records only where it is necessary, either because someone who has tested positive for COVID-19 has listed Stapleford Park as a place they visited recently, or because our premises have been identified as the location of a potential local outbreak of COVID-19.

NHS Test and Trace will work with you, if contacted, to ensure that information is shared in a safe and secure way. You can find further information on how NHS Test and Trace works here –

How NHS Test and Trace works

NHS Test and Trace will handle all data according to the highest ethical and security standards and ensure it is used only for the purposes of protecting public health, including minimising the transmission of COVID-19.

If you are contacted by NHS Test and Trace

Contact tracers will -

- call you from 0300 013 5000
- send you text messages from 'NHStracing'
- ask you to sign into the NHS Test and Trace contact-tracing website

Contact tracers will never -

- ask you to dial a premium rate number to speak to them (for example, those starting 09 or 087)
- ask you to make any form of payment or purchase a product or any kind
- ask for any details about your bank account
- ask for your social media identities or login details, or those of your contacts
- ask you for any passwords or PINs, or ask you to set up any passwords or PINs over the phone
- disclose any of your personal or medical information to your contacts
- ask about protected characteristics that are irrelevant to the needs of test and trace
- provide medical advice on the treatment of any potential coronavirus symptoms
- ask you to download any software to your PC or ask you to hand over control of your PC, smartphone or tablet to anyone else
- ask you to access any website that does not belong to the government or NHS



STAPLEFORD PARK

Legal Basis for Processing

The General Data Protection Regulation requires specific conditions to be met to ensure that the processing of personal data is lawful. These relevant conditions are below:

- Article 6(1)(c) – processing is necessary for compliance with a legal obligation to which the controller is subject.

Namely meeting the obligations of the Health and Safety at Work etc. Act 1974, Section 2 (1) and Section 3 (2). Which outlines employer's duty to protect the health, as well as safety, of their employees and others who may be exposed to health risks as a result of the employer's activities, including members of the public, service users and contractors.

- Article 6 (1)(f) - processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.

Namely for the purposes managing business continuity and the well-being of individuals with whom Stapleford Park interacts.

The processing of special categories of personal data, which includes data concerning a person's health, are prohibited unless specific further conditions can be met. These further relevant conditions are below:

- Article 9 (2)(b) - processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law in so far as it is authorised by Union or Member State law or a collective agreement pursuant to Member State law providing for appropriate safeguards for the fundamental rights and the interests of the data subject;

Namely for the performance or obligations which are imposed or conferred by law on the controller i.e. Health and Safety at Work Act 1974.

- Article 9(2)(g) – processing is necessary for reasons of substantial public interest, on the basis of Union or Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject.

Namely the processing of special category data for the purpose of monitoring and preventing the spread of a pandemic such as coronavirus, which is essential for the life of the data subject or that of another natural person (Recital 45, EU GDPR).



STAPLEFORD PARK

Data Retention Period

Information which is collected and stored solely for NHS Test and Trace will be retained for 21 days.

This reflects the incubation period for COVID-19 (which can be up to 14 days) and an additional 7 days to allow time for testing and tracing. After 21 days, this information will be securely disposed of or deleted.

Your Rights

You have the right to request access to the personal information we hold about you, to be informed about the collection and use of your personal information, for the information held to be corrected (where the law permits) and to ask us to restrict the processing of your personal information. In certain circumstances you have the right to object to the processing of your personal information. This information will not be subject to any automated decision making.

Questions/complaints/comments

Stapleford Park Limited is the controller and responsible for your personal data. Our data privacy manager is responsible for overseeing questions in relation to the processing of special category data. If you have any questions, including any requests to exercise any of your rights, please contact the data privacy manager using the details set out below.

Contact details

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