



## COVID-19 Privacy Policy

### What is the purpose of this document?

Dean's Garden Centre is committed to protecting the privacy and security of your personal information. This privacy notice describes how we collect and use the NHS Test & Trace information you provide us, in accordance with the General Data Protection Regulation (GDPR).

Following the Government Guidelines issued regarding the NHS Test & Trace in line with the Coronavirus Pandemic when visiting Hospitality sectors. It is now a legal requirement to provide certain information when visiting Hospitality sectors. Therefore Dean's Garden Centre requires this information from you when you visit our Coffee Shop. This means that we will ask you to complete the NHS Test & Trace section on the bottom of your food menu and return it to us when you go up to order your food, or alternatively use the NHS COVID-19 App and scan our QR Codes, specific to our establishment. The reason we are collecting this information is for legitimate interests, covered by GDPR Article 6.

We seek to collect your personal data in response to the recent outbreak of Coronavirus, as directed to do so by the Government, which is above and beyond what would ordinarily be collected from you, to ensure the safety and well-being of our staff and the general public and also protecting the NHS, Social Care sector and save lives.

Such information will be limited to what is proportionate and necessary, taking into account the latest guidance issued by the Government and health professionals, in order to manage and contain the virus.

Dean's Garden Centre is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

### Data Protection Principles

We will comply with data protection law. This says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

### The kind of information we hold about you

We are asking for your to provide your name and a contact number, if you visit in a group we will ask that your "lead member" completes their name and contact number on the form, we don't need all individual details. We will also record the date you visited us and the time you arrived.

If you decide to use the NHS COVID-19 App, we will not hold any of your personal information.

## How is your personal information collected?

If you do not have the app we will gather your information through the NHS Test & Trace section located at the bottom of the menu.

If you choose to use the NHS COVID-19 App and scan our QR Code, we will not have access to any of your personal information. Instead the App is designed to help control the spread of Coronavirus. The app works by using Bluetooth on your phone. Your phone will recognise other people's phones that use the app and send a small piece of information as a code to each other; this will then stay on your phone for 21 days before it is deleted. If you or another person using the app catches Coronavirus, the app can use the codes that your phone has shared to let you both know. You will then be told what to do to keep yourself and other people safe. The app will alert other people, but will not tell them who you are. The App requires you to enter the first part of your postcode, but it does not tell them your address. The app can be deleted at any time, deleting all information the app holds on your phone including the places you have checked into. Once deleted you will not receive any alerts or advice from the app. More information about the NHS COVID-19 App Privacy Notice can be found at the following website address:

<https://www.gov.uk/government/publications/nhs-covid-19-app-privacy-information/nhs-test-and-trace-app-early-adopter-trial-august-2020-privacy-notice>

## How we will use information about you

We will only use your personal information when the NHS Test & Trace team require it, which will allow them to rapidly detect people who have come into close contact with a new COVID-19 case and allowing them to minimise the transition of the virus which is crucial in protecting the NHS, Social Care sector and saving lives.

## Data Retention

### How long will you use my information for?

We will retain your personal information for 21 days, the required length of time as set out from the Government guidelines, which reflects the incubation period for COVID-19 (which can be up to 14 days) and an additional 7 days to allow for testing and tracing. After the 21 days has passed, we will destroy your information.

If you decide to use the NHS COVID-19 App, we will not hold any information on you, but your phone will store each "check in" for 21 days, unless you delete the app and all information held, including the places you have checked into will also be deleted.

## Data Storage

Where your data is passed to NHS Test & Trace in the case of a suspected outbreak, your information will be kept for up to 8 years, as part of the standard contract-tracing retention period set out by PHE.

## Legal basis under GDPR and Data Protection Act 2018

GDPR Article 6 (1e): The processing is necessary for the performance of its official tasks carried out in the public interest in providing and managing a health service

GDPR Article 9 (2h): The processing is necessary for the management of health & social care systems and services

GDPR Article 9 (2ii): The processing is necessary for reasons of public interest in the area of public health.

## **Your rights in connection with personal information**

You have a right to:

- Get copies of your information
- Get your information corrected
- Limit how your information is used
- Object to your information being used
- Get information deleted

## **Changes to this privacy notice**

- We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates.

## **Right to Complain**

- If you have any concerns about our handling of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office (ICO) by visiting:
- <https://ico.org.uk/concerns> or telephoning the ICO helpline on 0303 123 1113