



## **PRIVACY NOTICE – RECORD KEEPING TO SUPPORT TEST, TRACE, PROTECT**

This privacy notice covers how Pembrokeshire County Council (as a Data Controller) will collect, use and share your personal data to support Test, Trace, Protect which is the Welsh Government strategy to control the spread of new outbreaks of COVID-19.

### **Why we need your information (purpose of processing)**

We collect and use your personal information so that we can assist the NHS Wales Test, Trace, Protect service in conducting contact tracing. For the Test, Trace, Protect strategy to be effective, information about where those who have tested positive may have been in contact with others is essential. By maintaining records of staff, customers and visitors (and sharing these with NHS Test, Trace, Protect service when requested) this can help to identify people who may have been exposed to the virus to minimise transmission across the wider community and to safeguard business continuity.

The information that you provide will be processed according to the General Data Protection Regulation 2016 and the Data Protection Act 2018.

We will not make any disclosures to third parties for marketing purposes.

Your data will be secure and confidential at all times and we will only collect the personal information that is required in line with Welsh Government guidance.

### **What personal data are being collected?**

In order we can assist the NHS Test, Trace, Protect service we collect the following personal information:

#### **Staff**

- The names of staff who work at the premises.
- A contact telephone number for each member of staff.
- The dates and times that staff are at work.

#### **Customers**

- The names of customers or visitors, or if it is a group of people, the name of one member of the group – the 'lead member'.
- A contact telephone number for each customer or visitor, or for the lead member of a group of people.
- Date of visit, arrival and departure time.

### **What is our legal basis for processing your personal data?**

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

- Article 6 (1)(e) Public task: the processing is necessary for you to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law.

## Who will we share your information with?

We will only share your information with NHS Test, Trace, Protect service if they request it. It might be necessary to share this information either because:

- Someone who has tested positive for COVID-19 has listed an establishment as a place they visited recently.
- This establishment has been identified as a potential location of a local outbreak of COVID-19.

## How long do we keep hold of your information?

Pembrokeshire County Council will only keep your information for as long as necessary, taking into account Welsh Government guidance. Your information will be securely stored for 21 days after your visit. If your information has not been requested by the NHS Wales Test, Trace, Protect service, your data will be deleted or securely destroyed.

## Your Rights

Under the General Data Protection Regulation 2016 and Data Protection Act 2018, you have rights as an individual including:

- The right to **Rectification** – you have the right to ask to have your information corrected.
- The right to **Restrict** processing may apply – you may request that we stop processing your personal data however, this may delay or prevent us delivering a service to you. We will seek to comply with your request but may be required to hold or process information to comply with our legal duties.
- The right to **Object** – this is not an absolute right and will depend on the reason for processing your personal information.
- The right to not be subject to **Automated decision making and profiling**.
- The right of **Access** – you have the right to ask us for copies of your personal data. To make a request, please contact:

Access to Records  
Pembrokeshire County Council  
County Hall  
Haverfordwest  
SA61 1TP

Email: [acesstorecords@pembrokeshire.gov.uk](mailto:acesstorecords@pembrokeshire.gov.uk) Telephone: 01437 775798

## Complaints or Queries:

Pembrokeshire County Council endeavours to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this seriously. We encourage people to bring to our attention if they believe that our collection or use of information is unfair, misleading or inappropriate.

This privacy notice does not provide exhaustive detail of all aspects of our collection and use of personal information. However, we are happy to provide any additional information or explanation needed. Any requests for this should be sent to the address below:

Data Protection Officer  
Pembrokeshire County Council  
County Hall  
Haverfordwest  
SA61 1TP

July 2020

Email: [dataprotection@pembrokeshire.gov.uk](mailto:dataprotection@pembrokeshire.gov.uk)

Telephone: 01437 764551

If you want to make a complaint about the way we have processed your personal information, you can contact the Information Commissioner's Office as the statutory body which oversees data protection law:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

SK9 5AF

Email: [wales@ico.org.uk](mailto:wales@ico.org.uk)

Telephone No: 0303 123 1113

**Our Contact Details as Data Controller are:**

Pembrokeshire County Council, County Hall, Haverfordwest, Pembrokeshire, SA61 1TP.

Telephone number: 01437 764551 or [enquiries@pembrokeshire.gov.uk](mailto:enquiries@pembrokeshire.gov.uk)

Our Data Protection Officer's information is detailed above in the Complaints and Queries section.

**Changes to this privacy notice:**

We keep our privacy notice under regular review.