



TRINITY HOUSE

COVID-19 Contact Tracing Scheme Data Protection Privacy Notice

- **UK Contact Tracing Schemes**

Trinity House has taken steps to ensure that all persons using Trinity House premises, whether visitors, staff or contractors can do so safely consequent to the significant public health risks presented by the global COVID-19 pandemic. Such steps include, for instance, cooperation with the official UK COVID-19 Contact Tracing Schemes established in England and Wales. In England, the COVID-19 contact tracing scheme is operated by NHS *Test and Trace* and in Wales it is operated by NHS Wales *Test, Trace and Protect*.

These schemes, by their nature, involve Trinity House (as a Data Controller) collecting, processing and sharing certain information about you (your personal data) with the operators of the respective contact tracing schemes.

- **Information we will ask you to provide when visiting Trinity House premises**

When visiting Trinity House premises (including its Headquarters and Depots), whether as a member of the public, official visitor or for work (employee or contractor), Trinity House will request that you provide certain information about you. In such circumstances, Trinity House will also note certain details about your visit:-

The details that we will request from you include:-

- Name
- Contact Telephone Number*

Details that we will record about your visit

- Date of visit, arrival time and departure time (or am. / pm indication in the case of staff)

If you do not wish to provide the above information for contact tracing purposes this **will not**, in itself, prevent access to Trinity House premises. Disclosure of information for COVID-19 contact tracing purposes is **voluntary**.

However, for health & safety purposes more broadly, fire safety procedures and/or security reasons you may be asked to verify your identity and to register your attendance separately in accordance with existing access control procedures. However, any personal data collected

for such purposes, and which are subject to separate Data Protection controls (please see below), will **not** be used for COVID-19 contact tracing purposes.

**Please note, in the case of Trinity House staff, existing personal contact telephone numbers held by the Trinity House Human Resources (HR) Department will be used for contact tracing purposes.*

Staff may be asked to verify their contact details by the Trinity House HR Department from time to time in line with the Employee Personal Data Privacy Notice.

Having agreed to the use of your personal data for contact tracing purposes (as set out above), you have a right to request that Trinity House stops or restricts processing of your personal data, to erase any information it holds on you in this regard and to have access to your personal data. These rights are subject to the provisions of the GDPR and UK Data Protection Act 2018.

- **Lawful basis**

The lawful basis identified by Trinity House in respect of personal data processed and shared for the purposes of contact tracing is: **Legitimate Interests**

- **How will we share your personal data**

Personal Data collected for the purposes of a COVID-19 contact tracing scheme will be shared by Trinity House with **NHS Test and Trace (in England)** and with **NHS Test, Trace and Protect (in Wales)** and any other legitimate UK Public Health Authority. The personal data will be shared, when asked to do so by the above mentioned organisations, consequent to public health enquiries relating to an outbreak of COVID-19 or the infection of an individual with COVID-19. This will involve Trinity House providing the operators of the relevant scheme and individual contact tracers with your details. Please note that Trinity House will **not** be able to contact you before sharing your details to the relevant contact tracing scheme. You should always take appropriate steps, in line with Government guidelines, to verify the credentials of anyone purporting to be from a contact tracing scheme.

Please note that those working for contact tracing schemes **will not**:

- ask for bank details or payments.
- ask for details of any other accounts, such as social media.
- ask you to set up a password or PIN number over the phone.
- ask you to call a premium rate number, such as those starting 09 or 087.

- **How long we will keep your personal data**

Personal Data collected for the purposes of a COVID-19 contact tracing scheme will be erased by Trinity House after a period of 21 days from the date on which you provided your details to Trinity House.

- **What happens to your personal data after it has been shared for contact tracing purposes**

Once your personal data has been shared by Trinity House with the operator of a COVID 19 contact tracing scheme (effectively another Data Controller) your personal data will also be subject to the Data Protection protocols established by the operator of the relevant contact tracing scheme. In such circumstances your personal data may be retained by the operator of the scheme for a period beyond 21 days, possibly for an extended period, in accordance with the Data Protection requirements and legal basis applicable to the processing of your personal data by the relevant operator of the scheme.

To find out more about how your personal data may be processed in this regard:-

For NHS Test and Trace (England)

<https://www.england.nhs.uk/contact-us/privacy-notice/>

For NHS, Test, Trace and Protect (Wales)

<https://www.wales.nhs.uk/privacystatement>

Trinity House will still delete your personal data after 21 days after it has been shared with the operator of a contact tracing scheme.

- **Our Data Protection Officer**

If you have any concerns, further questions or wish to make a complaint as to how Trinity House processes and shares your personal data for contact tracing purposes you can contact our Data Protection Officer by writing to the following address:

Data Protection Officer
Trinity House Tower Hill
London EC3N 4DH

or by Email: data.protection@trinityhouse.co.uk

If you wish to find out about how Trinity House processes your data more generally and your rights in this regard as a data subject, you can view a copy of our **Data Protection Privacy Notice** by going online at <https://www.trinityhouse.co.uk/>

- **Information Commissioners Office**

If you wish to make a complaint as regards the manner in which Trinity House is processing and/or sharing your data, and you feel that the matter has not (or cannot) be suitably addressed, by Trinity House you may raise the matter with the Information Commissioners Office (ICO).

Contact details for the ICO are as follows:-

Information Commissioner
Wycliffe House Water Lane
Wilmslow Cheshire
SK9 5AF

www.ico.org.uk

Telephone: 0303 123 1113.