

TEST AND PROTECT DATA PRIVACY STATEMENT

Last Reviewed: 17th August 2020

INTRODUCTION

For the health and safety of the customers and staff in our spaces, we must collect name and contact details of customers to these premises to support NHS Scotland's Test & Protect. This information will be used to enable NHS Scotland to contact you should you have been in the 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.

WHERE WE COLLECT INFORMATION ABOUT YOU FROM

On entering one of our spaces that requires your details to be recorded, you will be asked to complete an online form. The information you provide will be shared with NHS Scotland (if requested) who are the responsible body for Test and Protect. 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. This will only be in the unlikely event there is a cluster of coronavirus cases linked to the venue.

Information will be transferred securely to NHS National Services Scotland who will use the data to contact trace those who were in our spaces at the same time as the positive case, and will provide guidance and support to those who may be advised to self-isolate.

Further information on the NHS Scotland Test and Protect strategy can be found on the NHS website.

WHAT PERSONAL DATA WE COLLECT AND HOW WE USE IT

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

- Name
- Contact telephone number

If you don't have a telephone number, you have the option to provide:

- Postal address, or
- Email address

Under data protection law, we have a number of lawful bases that allow us to collect, process and share personal information. In this case, the lawful basis for processing your data is **legal obligation**.

Basically, this means we are obliged to process the personal data to comply with the law which requires us to collect your data and share it with public health officers if they request it under The Health Protection (Coronavirus) (Restrictions) (Scotland) Amendment (No.11) Regulations 2020.

HOW WE KEEP YOUR DATA SAFE AND WHO HAS ACCESS

We undertake regular reviews of who has access to information that we hold to ensure that your information is only accessible by appropriately trained staff and contractors.

The personal data you provide will be kept for at least 3 weeks (21 days).

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

KEEPING YOUR INFORMATION UP TO DATE

We request that suppliers, contractors and clients make best attempts to ensure data held by the Students' Union is up to date and accurate. In the event of any

changes to data or the discovery of any inaccuracies please contact
hello@hwunion.com.

UNDERSTANDING THE DETAIL OF OUR DATA SECURITY MEASURES

When we process your data we will have already carefully assessed the lawful justification for doing so, the parameters in which the data is processed, the length of time the data is held for, the secure storage of your data and undertaken impact assessments to ensure your rights are delivered.

The Students' Union operates a Data Protection and Information Security Policy which is supported by a practical handbook for our employees and volunteers. All employees and volunteers handling data are required to undertake general data protection training and third parties handling data are required to provide a contract which meets the requirements of the Information Commissioner's Office.

YOUR RIGHT TO KNOW WHAT DATA WE HOLD ABOUT YOU, MAKE CHANGES OR ASK US TO STOP USING YOUR DATA

You have a right to ask us to stop processing your personal data, and if it's not necessary for the purpose you provided it to us for (e.g. Union policy) we will do so. Contact us on 0131 451 5333 or privacy@hwunion.com if you have any concerns.

You have a right to ask for a copy of the information we hold about you. If there are any discrepancies in the information we provide, please let us know and we will correct them.

If you want to access your information, you must complete the Subject Access Request Form with a description of the information you want to see and the required proof of your identity by post to Heriot-Watt University Student Union,

Riccarton, Edinburgh, EH14 4AS. We do not accept these requests by email so we can ensure that we only provide personal data to the right person.

If you have any questions please send these to privacy@hwunion.com, and for further information see the [Information Commissioner's guidance here](#).

CHANGES TO THIS STATEMENT

We may change this Privacy Statement from time to time. If we make any significant changes in the way we treat your personal information we will make this clear on our Website or by contacting you directly.

If you have any questions, comments or suggestions, please let us know by contacting privacy@hwunion.com