Privacy notice: Personal Data for Test and Protect Strategy

For the health and safety of the customers/visitors and staff in Falkirk Community Trust premises, we are recording the name and contact details of everyone who enters our indoor venues for longer than 15 minutes to support NHS Scotland's efforts in tackling COVID-19. This information will be used to enable NHS Scotland and statutory partners 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.

Why do we need to collect this data?

As stated above, the purpose for which we are processing your personal data is to assist with NHS Scotland's efforts in tackling the coronavirus public health epidemic. This will involve the gathering and, when necessary, the sharing of information with NHS Scotland and statutory partners. Your data will not be used for any other purpose, unless you have opted-in to receive communications from Falkirk Community Trust.

In order to assist in the containment of the virus, we will only share your data when it is requested directly by NHS Scotland and statutory partners. This will only be in the unlikely event there is a cluster of coronavirus cases linked to the premises.

For further information on the NHS Scotland Test and Protect strategy, please visit the **NHS website**.

What data will we collect?

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

- your name
- your contact telephone number

If you do not have a telephone number, you have the option to provide:

- a postal address; or
- an email address

If you provide anyone else's personal information, please ensure that you have told them that you have given their information to us.

What is our lawful basis for collecting this data?

Under data protection law, GDPR Article 6(1), we have a number of lawful bases that allow us to collect and process personal information. In this case, the lawful basis for processing your data is **'legitimate interests'**.

Broadly speaking 'legitimate interests' means that we can process your personal information if we have a genuine and legitimate reason and we are not harming any of your rights and interests.

Our legitimate reason for processing your data is to assist with NHS Scotland's Test and Protect strategy in relation to the coronavirus public health epidemic.

Before sharing any information we will carefully consider and balance any potential impact on you and your rights.

How long will we retain the data?

If you have not opted-in to receiving communications from Falkirk Community Trust, your personal data will be retained only for the purposes stated in this privacy notice and will be held by us for no more than three weeks (21 days).

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

Do you have a complaint?

If you consider that your personal data has been misused or mishandled by us, you can raise this with the data controller. In this instance, the data controller is Falkirk Council. You can contact the data protection officer at:

Data Protection Officer

Suite 1A The Falkirk Stadium 4 Stadium Way Falkirk FK2 9EE

dpo@falkirkcommunitytrust.org

If you remain dissatisfied you can make a complaint to the Information Commissioner, who is an independent regulator. The Information Commissioner can be contacted at:

Information Commissioner's Office

Wycliffe House Water Lane Wilmslow, Cheshire SK9 5AF

0303 123 1113 casework@ico.org.uk

or if you prefer to use a national rate number:

01625 545 745