

Supporting NHS Test and Trace Privacy Notice

Under the General Data Protection Regulation 2016 (GDPR) and Data Protection Act 2018 (DPA) Black Country Housing Group Ltd., 134 High Street, Blackheath, West Midlands, B65 0EE is a Data Controller for the information it holds about you. We will collect, process and hold personal data provided by you for the purpose of supporting NHS Test and Trace for individuals who used or visited *New Bradley Hall or Gower Gardens*, in line with government requirements and guidelines to help stop the spread of COVID-19. The lawful basis under which we collect, process and hold personal data for this purpose is Legitimate Interests in relation to Article 6 (1)(f) the General Data Protection Regulation 2016 (GDPR).

Information we collect about you

We will collect the following information to fulfil our obligations in supporting NHS Test and Trace:

- Names (of those staff members working at the premises and customers/visitors who attend the site)
- Contact Numbers (of those staff members working at the premises and customers/visitors who attend the site)
- Dates and times that staff members worked
- Date, times and duration of customers/visitors attending the site
- If a customer/visitor only interacted with one member of staff during their visit, then the name of the assigned staff member will be recorded alongside the name of the customer/visitor

Use of your personal data

We are collecting your personal data for the following purposes:

- To help support the NHS Test and Trace service by holding personal information for those individuals who have accessed, visited or used *New Bradley Hall or Gower Gardens*.

Sharing of your personal data

We MAY share your information with the following third parties for the reasons detailed above if requested by them:

- NHS Test and Trace
- Public Health England

We will not sell or rent your information to third parties. We will not use or share your information with third parties for marketing purposes.

Keeping your personal data

We are required to hold your personal data for a period of 21 days after you have visited. Once this 21-day period has expired, we will securely dispose of your personal information in line with GDPR/Data Protection legislation and requirement.

Protecting your personal data

We are strongly committed to data security and will take reasonable and appropriate steps to protect your personal information from unauthorised access, loss, misuse, alteration or corruption. We have put in place physical, electronic, and managerial procedures to safeguard the personal information that we hold. We do not currently transfer your data to any third country or international organisation.

Your rights

There are several rights that you may exercise depending on the legal basis for processing your personal data. In most cases, these rights are not absolute and there may be compelling or overriding legal reasons why we cannot meet these rights in full. This will be explained to you in more detail should you contact us for any of the reasons detailed below:

- Request a copy of the personal information we hold about you
- To have any inaccuracies corrected
- To have your personal data erased
- To place a restriction on our processing of your data
- To object to processing and
- To request your data to be ported (data portability)
- To object to any automated decision-making including profiling and the right to ask for any automated decision making to be reviewed by a human

Where the processing of your personal data is based on your consent, in most circumstances, you have the right to withdraw that consent at any time and we will act on your instructions.

For more information about how the Council may use your data and to learn more about your rights please see our Privacy Statement at www.bchg.co.uk.

If you have any concerns or questions about how your personal data is processed, please contact our Data Protection Officer at the above address or by email to data@bchg.co.uk.