

## **East Renfrewshire Culture and Leisure Trust Privacy Notice – Track & Contact Tracing**

### **Introduction**

For the health and safety of the customers/visitors and staff in these premises, we are recording the name and contact details of everyone who enters 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.

Our full privacy policy can be viewed at <https://www.ercultureandleisure.org/privacy>

### **What is contact tracing?**

Contact tracing is a process for identifying people at risk of coronavirus (COVID-19) infection because they've been physically close enough to a person who has tested positive.

Contact tracing is part of the national Test and Protect approach to containing the virus. More about Test and Protect is provided on the Scottish Government website at <https://www.gov.scot/publications/coronavirus-covid-19-test-and-protect/>

### **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.

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.

### **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; and
- contact telephone number.

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

- a postal address; or
- an email address.

### **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.

### **How long will we retain the data?**

Your data that is collected for NHS Test and Trace will be retained locally by the venue you have visited for 21 days after your visit, at which point it will be deleted or destroyed, unless the venue usually collects the data for other legitimate business purposes in accordance with the GDPR. All personal data will be held and disposed of in a safe and secure manner.

### **Your data processing rights**

Depending on why we need to process your information you will have rights to how your information is used. Further information about your rights, including the circumstances in which they apply, can be found within our main Privacy statement published on our website at <https://www.ercultureandleisure.org/privacy>

You can contact us regarding the processing of your data in the following ways

- Write to us:  
East Renfrewshire Culture and Leisure  
St John's Campus  
18 Commercial Road  
Barrhead G78 1AJ
- Telephone us: 0141 577 3500

If you have a concern about the way in which we have collected or used your personal data, you can raise the matter in the first instance with our Data Protection Officer. Contact details can be found in our main privacy statement at <https://www.ercultureandleisure.org/privacy>

If you remain dissatisfied you can make a complaint to the Information Commissioner, who is an independent regulator. Advice about data protection, privacy and data sharing, visit the Information Commissioner's Office website at <https://ico.org.uk/your-data-matters/>.

### **Do you require this statement in a different format**

Please contact us if you require this information in an alternative format.

### **Review**

This notice will be kept under regular review and was last updated on the 20<sup>th</sup> July 2020