

Privacy Notice – Coronavirus (COVID-19) Data Collection

Supporting Efforts to Protect Students, Staff and Visitors to the Campus

Privacy Notice
<p>This privacy notice explains how the University of Strathclyde uses your personal information in relation to efforts to stop the spread of Covid-19, and to support staff and students affected by it.</p> <p>We collect data: when you enter University buildings; and when you inform us of your test results, symptoms or NHS request to self-isolate. We also ask students in University accommodation to inform us of: arrival and departure dates; whether they are quarantining on arrival; and which countries they have been in (for quarantine purposes).</p> <p>We collect data in line with Scottish Government guidance relating to Covid-19, in particular: Guidance for Higher and Further Education Institutions and Student Accommodation Providers, and Multi-sector guidance on collection of customer and visitor contact details.</p> <p>It is important that you read this notice prior to providing your information.</p>
Who we are
<p>Under data protection legislation the University of Strathclyde is a 'Data Controller'. This means that the University is responsible for how it collects and processes your personal data.</p> <p>If you have any questions regarding the handling of your personal data, or your rights, please contact the University's Data Protection Officer at dataprotection@strath.ac.uk</p>
Information we collect and use about you
<p>For the health and safety of students, staff and visitors on University premises, we are recording the name and contact details of everyone who enters our premises to support NHS Scotland's efforts in tackling Covid-19. This information will be used to enable NHS Scotland's Test & Protect programme 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.</p> <p>When you enter University premises, we will collect, at a minimum:</p> <ul style="list-style-type: none">• the date and time of your arrival and departure,• your name; and• contact telephone number. <p>If you do not have a telephone number, you have the option to provide a postal address; or an email address.</p> <p>We may use different methods of collecting this data – for example, in some buildings you may be asked to sign a register, but in others existing access cards will automatically collect this data when you swipe to access a building.</p>

For students accessing learning spaces we may ask you to register your attendance online. The following data will be processed: login name, full name, email address, the department they are in, the location they were in and duration in that location. We may engage a third party to provide this service on our behalf. In such circumstances an appropriate data processing agreement will be in place and your data will only be used by the University, for the purposes set out in this notice.

We also ask staff or students to inform the University at the earliest opportunity if they have tested positive for Covid-19, have symptoms, or have been asked by the NHS to self-isolate. The NHS Test & Protect programme will share data with the University, where necessary, but direct notification from individuals will enable the University to take early action to help prevent the spread of Covid-19, and to support staff and students affected by it.

When staff or students choose to notify the University, we will ask for:

- your name and contact details,
- information about your symptoms, test results, and whether you have been asked to self-isolate,
- information about University buildings you have visited or events you have attended; and
- details of anyone you have been in close contact with on campus.

Students in University accommodation will be asked to indicate departure and arrival dates; whether they will be quarantining on arrival and which countries (if any) they have visited since their departure from hall.

The University is running a COVID-19 test centre for those with no symptoms. Information about the test centre and the data collected can be found in the [Privacy Notice University COVID-19 Test Centre](#).

Why we require this information and our lawful basis

The purpose for which we are processing your contact details is to assist with NHS Scotland's Test and Protect strategy in relation to the coronavirus public health epidemic.

This will involve the gathering and, when required, the sharing of information with NHS Scotland as 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 event there is a cluster of coronavirus cases linked to the premises. Information will be transferred securely to NHS National Services Scotland who will use the data to contact trace those who were in the establishment at the same time as the positive case, and will provide guidance and support to those who may be advised to self-isolate. For further information on the NHS Scotland Test and Protect strategy please visit the [NHS website](#).

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.

<p>The purpose for which we are processing information: about test results and symptoms; and student arrivals, departures, quarantine-requirements and countries visited for those in University residences, is to enable the University to take early action to help prevent the spread of Covid-19, and to support staff and students affected by it. Again, our lawful basis for processing your data is 'legitimate interests'. Where we process special category data relating to health, GDPR Article 9 2(i) allows us to do so where it is necessary for reasons of public interest in the area of public health.</p>
<p>Disclosing your information</p>
<p>When required, information will be shared with NHS Scotland, as 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.</p>
<p>How long your information is retained</p>
<p>Your personal data, collected for the purposes stated in this privacy notice, will be held by us for at least 3 weeks (21 days). All personal data will be held and disposed of in a safe and secure manner.</p>
<p>Your rights</p>
<p>Under data protection legislation, you have a number of rights* including the right to:</p> <ul style="list-style-type: none"> - access your personal data and obtain a copy, free of charge; - rectify inaccuracies in personal data that we hold about you; - erasure, that is have your details removed from systems that we use to process your personal data; - restrict the processing in certain ways; and - object to certain processing of your personal data by us. <p>Further information is available on the Information Commissioner's Office website.</p> <p>*Please note that the ability to exercise these rights will vary and depend on the lawful basis under which the processing is being carried out.</p> <p>Please contact dataprotection@strath.ac.uk if you wish to exercise/enquire about any of these rights.</p>
<p>Complaints</p>
<p>If you wish to make a complaint about how we have handled your personal data, you can contact the Data Protection Officer at dataprotection@strath.ac.uk.</p> <p>If you are not satisfied with our response or believe we are not processing your personal data in accordance with the law, you also have the right to complain to the Information Commissioner's Office (https://ico.org.uk/concerns/).</p>