

## Ayrshire College Privacy Notice – Test and Protect COVID19 Data Processing in relation to Test and Protect

Ayrshire College is providing you with this information to comply with data protection law and to ensure that you are fully informed and we are transparent in how we collect and use your personal data.

### Who is collecting the information?

Ayrshire College is the Data Controller and is responsible for looking after your data.

Registered office – Ayr Campus

Dam Park, Ayr

KA8 0EU

We have an appointed Data Protection Officer (DPO), Lisa Powell, who can be contacted by emailing: [dataprotection@ayrshire.ac.uk](mailto:dataprotection@ayrshire.ac.uk)

### This privacy statement relates to the following process:

- Collection of daily attendance data related to physical attendance on campus, which will include contact details.
- Sharing of contact details with NHS tracers, in relation to the Scottish Government's Test and Protect initiative.

### Why are we collecting it and what are we doing with it? (Purpose)

The purpose of the processing is to ensure the health and safety of all individuals who attend the College in any capacity. NHS Scotland may ask for your information to contact you if they believe you have been in contact with someone who has tested positive for the coronavirus COVID-19.

Your contact details may be shared with NHS tracers if:

- The College regards the request as necessary and proportionate to protect your health; and
- The College is assured of the identity of the tracer. NHS tracers will contact you to make you aware of any actions you should take to protect your own health, and the health of others.

### The following personal data required for this process is:

- Name
- Address
- Contact Number
- Main areas attended in the College
- Time in/out

### The data being used does not include special category (sensitive) data.

We collect this directly from the individual when on site at the College.

## Our lawful basis for processing the data is:

Article 6(1)(c) "processing is necessary for compliance with a legal obligation to which the controller is subject" Health and Safety at Work etc Act 1974, 2. General duties of employers to their employees; and 3. General duties of employers and self-employed to persons other than their employees.

## Who we share the information with:

Your data will only be shared with NHS Scotland, if they contact the College in relation Test and Protect and locating individuals who may require to be tested.

You can see the Scottish Government's official guidance here: <https://www.gov.scot/news/contact-tracing-information-gathering/> and their privacy notice here: <https://www.gov.scot/contact-tracing-privacy-notice>

## Your data will be retained for the following length of time:

21 days. It will then be destroyed securely following college procedures.

## The following rights are rights of data subjects:

- The right to be informed (i.e. this privacy notice)
- The right to access your personal data
- The right to rectification if the personal data we hold about you is incorrect
- The right to restrict processing of your personal data

## The following rights apply only in certain circumstances:

- The right to object to our processing of your personal data
- The right to request erasure (deletion) of your personal data
- The right to data portability
- The right to know of any automated individual decision making and/or profiling – the College does not use any automated individual decision-making about you for the purpose of COVID 19 Test and Protect.

## Contact us

If you are concerned about how your personal data is being used by the College, in the first instance please contact the College Data Protection Officer (DPO) at [dataprotection@ayrshire.ac.uk](mailto:dataprotection@ayrshire.ac.uk)

## Complaints to UK Information Commissioner's Office (ICO)

If you are dissatisfied with the response from the College you have the right to lodge a complaint with the Information Commissioner's Office about our handling of your data. The ICO has guidance on their website here: <https://ico.org.uk/your-data-matters/raising-concerns/>

You can email them at [casework@ico.org.uk](mailto:casework@ico.org.uk) or call them on 0303-123-113 or you can send a letter to them at the following address:

Customer Contact  
Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
SK9 5AF