Privacy Notice for Coronavirus (Covid-19) Response Activity

Introduction

Royal Holloway and Bedford New College, also known as Royal Holloway, University of London, will act in accordance with the General Data Protection Regulation (GDPR) and the Data Protection Act 2018 when controlling and processing your personal data.

This notice explains how we collect, use and share your personal data and your rights in relation to the processing of your data.

In this notice:
• ‘personal data’ means any data which can identify you directly or indirectly (whether by itself or when combined with other data), regardless of the format or media on which the data are stored. This includes data that can identify you when combined with other data that is held separately (pseudonymous data) but does not include data that has been manipulated so that you can no longer be identified from it (anonymous data).
• ‘special category data’ is personal data that needs more protection because it is sensitive. The GDPR defines special category data as personal data related to racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic, biometric, health, sex life and sexual orientation.
• ‘processing’ means any activity relating to your personal data including collection, use, alteration, storage, disclosure and destruction.

We keep this notice under regular review. This notice was last updated on 24th September 2020

Purpose

The purpose for which we are processing your personal data is to operate the College’s response to the coronavirus (Covid-19) public health epidemic. This will involve the dissemination and gathering of information.

While it is not possible to give an exhaustive list in the current fast developing circumstances, examples include communicating public health advice, dealing with enquiries, collecting and disclosing contact details.

The data

We will process the following personal data if applicable:
• your name
• your current address
• your email address
• your phone number
• other data you volunteer

We may also process other information where necessary and proportionate. We may also process special category data regarding your health.

Legal basis of processing

The legal bases for processing your personal data are:

• Public task. The processing of your personal data may be necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in us (Article 6(1)(e) of GDPR).

Our legal basis for processing any special category data is:

• It is necessary for reasons of substantial public interest for the exercise of meeting UK Government guidance and restrictions related to the Coronavirus (Covid-19) public health epidemic. (Article 9(2)(g)(h) of GDPR).
• Consent (Article 6 (1)(a) of GDPR).

Retention

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

We will keep the personal data you provide for this purpose for 21 days, as recommended by the UK Government.

Where your data has been anonymised and is therefore no longer attributable to you as an individual, it may be kept indefinitely.

Recipients

Where necessary and proportionate, your personal data may be shared with other public bodies, including the NHS and Public Health England (PHE).

Please note that in certain circumstances we may need to share your personal information with a regulator or to otherwise comply with the law.

Sources of Information

Information may be obtained from other data controllers where necessary and proportionate.

International Data Transfers

Personal data about you will be stored on IT infrastructure within the UK or elsewhere within the European Economic Area (EEA).
How the College keeps your personal data secure

The College has put in place appropriate technical and organisational security measures to prevent your personal data from being accidentally lost, used or accessed in any unauthorised way or altered or disclosed. In addition, the College limits access to your personal data to the persons and organisations, including those described above, who have a lawful and/or legitimate need to access it.

The College has also put in place procedures to deal with any suspected personal data security breach and will notify you and any applicable regulator of a suspected breach where legally required to do so.

Your rights

You have a number of rights in relation to the processing of your personal data by the College:

- **Access:** You have the right to request access to and be provided with a copy of the personal data held about you together with certain information about the processing of such personal data to check that the College is processing it lawfully and fairly.
- **Correction:** You have the right to request correction of any inaccurate or incomplete personal data held about you.
- **Deletion:** You have the right to request erasure of any personal data held about you where there is no good reason for the College to continue processing it or where you have exercised your right to object to the processing of your personal data.
- **Restriction:** You have the right to request restriction of how the College processes your personal data; for example, to confirm its accuracy or the College’s reasons for holding it or as an alternative to its erasure.
- **Objection:** You have the right to object to the College’s processing of any personal data which is based on the legitimate interests of the College or those of a third party based on your particular circumstances. You also have the right to object to the College processing your personal data for direct marketing purposes.
- **Portability:** You have the right to receive or request that the College transfers a copy of your personal data in an electronic format where the basis of the College processing such personal data is your consent or the performance of a contract, and the information is processed by automated means.
- **Complaints:** You have the right to complain to the Information Commissioner’s Office (ICO) in relation to how the College processes your personal data. Our registration number with the Information Commissioner’s Office is Z7056965.

The College may be entitled to refuse any request in certain circumstances and where this is the case, you will be notified accordingly.

Where the lawful ground relied upon by the College to process any of your personal data is your consent, you have the right to withdraw such consent at any time without having to give any reason. To withdraw consent employees should contact hrsystems@rhul.ac.uk and students should contact the Head of Student Advisory and Wellbeing at supportingyou@royalholloway.ac.uk. However, if you do so, the College may not be able to provide some or all of its services to you or the provision of those services may be affected.
You will not have to pay any fee to exercise any of the above rights, though the College may charge a reasonable fee or refuse to comply with your request if any request is clearly unfounded or excessive. Where this is the case, you will be notified accordingly.

To protect the confidentiality of your personal data the College may ask you to verify your identity before fulfilling any request in relation to your personal data.

Changes to this notice

The College may update this notice at any time and may provide you with further notices on specific occasions where we collect and process personal data about you. You should check this notice regularly to take notice of any changes. Where any change affects your rights and interests, we will make sure we bring this to your attention and clearly explain what this means for you.

Questions or comments

If you have any questions or comments regarding this notice or you wish to exercise any of your rights you should contact our Data Protection Officer by email at dataprotection@royalholloway.ac.uk.

You also have the right to complain to the Information Commissioner’s Office and you can find more information on their website – www.ico.org.uk.