

## Worcester College Oxford Privacy Notice: College COVID19 Tracking System (v.1.2)

### Our contact details

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### What type of information we have:

The College's Privacy Notices and Records of Processing Activities are available at <https://www.worc.ox.ac.uk/about/policies-and-procedures/privacy-gdpr>. Please consult those for details of how we process your data.

As we are collecting some data not currently covered by those notices and/or processing it for new purposes, this privacy notice details how we will collect and process the following information:

- Your name
- Your accommodation allocation and household
- Your COVID19 status

### How we get data and why we have it:

Most of the personal data we process is provided to us directly by you for one of the following reasons:

- To allow the College to run a COVID19 tracking system which monitors College members' COVID 19 statuses following University Protocol. This allows the College to alert College members of the actions they are required to take in the event of a housemate's COVID19 infection. It also allows the College to offer Welfare and Practical support to the individual and households affected. The system aims to protect the health and wellbeing of our community of staff and students and to minimise the risk of COVID19 transmission.

We also receive personal information indirectly, from the following sources in the following scenarios:

- The University's Early Alert Service (EAS) will share data with the College (see the EAS Privacy Notice at <https://earlyalert.medsci.ox.ac.uk/earlyalert/booking/privacy>).

Under the General Data Protection Regulation (GDPR), the lawful bases we rely on for processing this information are:

- We have a legitimate interest in stopping the spread of coronavirus through our College community

### Special category data

"Special categories" of particularly sensitive personal data require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal data.

In this instance, we are relying on:

- Processing is necessary for the purpose of meeting our health and safety obligations to our employees

### **What we do with the information we have**

We use the information that you have given us in order to:

- Inform you and/or your household of actions you are required to take
- Offer welfare and practical support to individuals and households affected

The information will be shared with the Lodge (as the College's Single Point of Contact); the Welfare Team (to provide welfare support); the Home Bursar; and the IT Department (as the system administrator).

Data will be anonymised in order to inform College operational staff of rooms and households they should not enter.

We will only use the data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another related reason and that reason is compatible with the original purpose. If we need to use the data for an unrelated purpose, we will seek the consent of the individuals involved to use it for that new purpose.

Note that for positive tests the University's Early Alert Service (EAS) is legally obliged to inform Public Health England (or its relevant successor body).

We will not sell your data to third parties. We will only share it with third parties if we are allowed or required to do so by law.

### **How we store your information**

Your information is securely stored by Worcester College Oxford in line with our Information Security Policy (available at <https://www.worc.ox.ac.uk/about/policies-and-procedures/privacy-gdpr>).

We keep active case information for as long as a case is active. Historic case information will be anonymised automatically after 3 months, to allow for welfare monitoring and reporting.

### **Your data protection rights**

Subject to certain conditions set out in UK data protection law, you have:

- The **right to request access** to a copy of your data, as well as to be informed of various information about how your data is being used;
- The **right to have any inaccuracies in your data corrected**, which may include the right to have any incomplete data completed;
- The **right to have your personal data erased** in certain circumstances;
- The **right to have the processing of your data suspended**, for example if you want us to establish the accuracy of the data we are processing;
- The **right to receive a copy of data you have provided to us**, and have that transmitted to another data controller (for example, another University or College);
- The **right to object to any direct marketing** (for example, email marketing or phone calls) by us, and to require us to stop such marketing;

- The **right to object to the processing of your information** if we are relying on a “legitimate interest” for the processing or where the processing is necessary for the performance of a task carried out in the public interest;
- The **right to object to any automated decision-making** about you which produces legal effect or otherwise significantly affects you;
- Where the lawful basis for processing your data is **consent**, you have the **right to withdraw your consent at any time**. When you tell us you wish to exercise your right, we will stop further processing of such data. This will not affect the validity of any lawful processing of your data up until the time when you withdrew your consent. You may withdraw your consent by contacting the College’s Data Protection Officer, Worcester College, Walton Street, Oxford. OX1 2HB; [dataprotection@worc.ox.ac.uk](mailto:dataprotection@worc.ox.ac.uk).

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

The College has a Data Protection Officer, whose contact details are: Worcester College, Walton Street, Oxford. OX1 2HB; [dataprotection@worc.ox.ac.uk](mailto:dataprotection@worc.ox.ac.uk).

Please contact the Data Protection Officer if you are considering how or whether to exercise your rights.

### **How to complain**

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO’s address is:

Information Commissioner’s Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Helpline number: 0303 123 1113