

PRIVACY NOTICE: COVID-19 - NHS TEST AND TRACE

List of Staff and Visitors to Churches Conservation Trust Sites

To support NHS Test and Trace (which is part of the Department for Health and Social Care) in England, we have been mandated by law to collect and keep a limited record of staff, customers and visitors who come onto our premises for the purpose of **contact tracing**. This is the process of identifying, assessing, and managing people who have been exposed to a disease to prevent onward transmission and the investigation of local outbreaks.

By maintaining records of staff, customers and visitors, and sharing these with NHS Test and Trace where requested, we can help to identify people who may have been exposed to the coronavirus.

1. About Us

Your personal data will be collected and used by The Churches Conservation Trust, charity number 258612, with data controller number Z6207323. We are the data controller; this means we decide how your personal data is used and why.

We will be responsible for compliance with data protection legislation for the period of time we hold the information. When that information is requested by the NHS Test and Trace service, the service would at this point be responsible for compliance with data protection legislation for that period of time.

2. The information we collect about you

When visiting our site, you will be asked to provide some basic information and contact details. The following information will be collected:

- the names of all customers or visitors, or if it is a group of people, the name of one member of the group
- a contact phone number for each customer or visitor, or for the lead member of a group of people
- date of visit and arrival time and departure time
- the name of an assigned staff member will be recorded alongside your information, where applicable.

We may require you to pre-book appointments for visits or to complete a form on arrival.

3. Lawful basis

The use of your information is covered by the General Data Protection Regulations Article 6 (1) (c) – a legal obligation to which we as a venue/establishment are subject to. This means that we are mandated by law, by a set of new regulations from the government, to co-operate with the NHS Test and Trace service, in order to help

maintain a safe operating environment and to help fight any local outbreak of corona virus.

Under government guidance, the information we collect may include information which we would not ordinarily collect from you and which we therefore collect only for the purpose of contact tracing. Information of this type will not be used for other purposes, and NHS Test and Trace will not disclose this information to any third party unless required to do so by law (for example, as a result of receiving a court order).

4. Sharing your data

We will only share information with NHS Test and Trace if it is specifically requested by them. For example, if another customer at the venue reported symptoms and subsequently tested positive, NHS Test and Trace can request the log of customer details for a particular time period (for example, this may be all customers who visited on a particular day or time-band, or over a 2-day period).

The NHS Test and Trace service, as part of safeguarding your personal data, has in place technical, organisational and administrative security measures to protect your personal information that it receives from the venue/establishment, that it holds from loss, misuse, and unauthorised access, disclosure, alteration and destruction.

5. Data Retention

NHS Test and Trace have asked us to retain this information for 21 days from the date of your visit, to enable contact tracing to be carried out by NHS Test and Trace during that period. Where the information is only collected for the purpose of contact tracing, it will be destroyed by us 21 days after the date of your visit.

However, the government guidance may also cover information that we would usually collect and hold onto as part of our ordinary dealings with you. Where this is the case, this information only will continue to be held after 21 days and we will use it as we usually would, unless and until you tell us not to.

Your information will always be stored and used in compliance with the relevant data protection legislation, and will not be transferred outside the United Kingdom.

6. Your Legal Rights

Unless subject to an exemption under the General Data Protection Regulations or Data Protection Act 2018, you have the following rights with respect to your personal data: -

- The right to be informed about any data we hold about you;
- The right to request a copy of your personal data which we hold about you;
- The right to withdraw your consent at any time, while the church body still has your data;

- The right to request that we correct any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary for us to retain such data;
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right to obtain and reuse your personal data to move, copy or transfer it from one IT system to another.

7. Complaints and queries

If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact us by email on consent@theccct.org.uk or telephone on 0845 303 2760.

If you would prefer to contact in writing, please address your letter to:

The Churches Conservation Trust
Society Building
8 All Saints Street
London
N1 9RL

If you are unhappy with how The Churches Conservation Trust have handled your data, please let us know so we can investigate immediately.

You also have the right to lodge a complaint with the Information Commissioners Office. You can contact the Information Commissioners Office on 0303 123 1113 or online: <https://ico.org.uk/make-a-complaint/your-personal-information-concerns/> or <https://ico.org.uk/global/contact-us/>