

1. The reasons why we use your personal data

- 1.1. Häfele U.K. Ltd is collecting and recording the contact details of individuals who make use of our premises, to support the NHS for contact tracing purposes. Your contact details will be used to enable the NHS 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 containing any spread.
- 1.2. As more and more people return to work and begin to carry out their duties, the safety and wellbeing of our colleagues, customers, suppliers and visitors continues to be at the forefront of our organisation. It may be necessary for us to share that data on request from the NHS Test and Trace and we will play our part to help make this process as effective as possible in identifying people who may have been exposed to coronavirus.
- 1.3. This privacy notice describes how we may use your information during the Covid-19 outbreak. It supplements our main Workforce Data Privacy Notice.

2. What information do we collect?

- 2.1. We take careful consideration to only collect and use personal information when we need it to deliver a service or meet a requirement. In this instance, for contact tracing, it may include: your name, contact telephone number, postal address, email address, date of visit, time of arrival and time of departure.

3. How are we allowed to use your personal data?

- 3.1. Any information used or shared during the Covid-19 outbreak will be limited to the period of the outbreak unless there is another legal basis to use the data for another purpose.

4. Who we share your personal data with?

- 4.1. 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 (e.g. this may be all customers who visited on a particular day or time-band, or over a two-day period). NHS Test and Trace will not disclose this information to any third party unless required to do so by law (e.g. as a result of receiving a court order).
- 4.2. The General Data Protection Regulation (GDPR) allows Public Health England to use the personal information collected by NHS Test and Trace. The section of the GDPR that applies is:

Article 6(1)(e) 'processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller'

- 4.3. As information about health is a special category of personal information, a further section of the GDPR applies:

Häfele's Covid-19 & NHS Test & Trace Privacy Notice



Article 9(2)(i) 'processing is necessary for reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health or ensuring high standards of quality and safety of healthcare'

4.4. Public Health England also has special permission from the Secretary of State for Health and Social Care to use personally identifiable information without people's consent where this is in the public interest. This is known as 'Section 251' approval and includes the use of the information collected by NHS Test and Trace to help protect the public from coronavirus. The part of the law that applies here is Section 251 of the National Health Service Act 2006 and the associated Health Service (Control of Patient Information) Regulations 2002.

5. Retention of data

5.1. We believe that the temporary record of data does not need to be longer than 21 days from the date of your visit, this covers the 14-day incubation period of Covid-19 and assists the NHS with requests for that data, if needed. The data will carefully be stored. Thereafter it will be promptly and securely deleted. Data processing activities for the purposes of Covid-19 will be reviewed at the end of the year.

5.2. Please note, the government guidance may also cover information that we would usually collect and hold onto as part of our ordinary dealings with you (perhaps, for example, your name and contact details). 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.

6. Other information

6.1. Please refer to our other privacy notices for further information.

7. Data Protection Compliance

7.1. The Company has appointed a compliance officer in respect of its data protection activities. He can be contacted regarding data retention queries at data@hafele.co.uk

Changes to the policy and procedure will be communicated to staff in an appropriate manner.

Signed on behalf of Häfele UK Limited

Chief Human Resources Officer

Date