



Privacy Notice – COVID-19 LFD at Home Testing

April 2021

This privacy notice provides you with information about us, why we collect information from you, what we do with the information we collect from you, who we share your information with and your rights under the Data Protection Act (2018) and the UK General Data Protection Regulation (“GDPR”) in relation to that information.

This notice applies to staff and students collecting Covid-19 Test Kits from Dundee and Angus College. This notice does not form part of any contract to provide services. We may update this notice at any time.

When you collect Covid-19 Test Kits at Dundee and Angus College, we collect personal information about you, in order that we can identify you and to allow us to log details of the kits issued to you. We process (this means to doing anything with the information such as to collect, store, use, access, destroy or share) information which relates to you in accordance with the GDPR and Data Protection Act. The purpose of this notice is to make you aware of how we handle your personal data.

"Personal data" means recorded information we hold about you from which you can be identified or may be identifiable. It may include contact details, other personal information, photographs, expressions of opinion about you or indications as to our intentions about you.

If you have any questions about your data or this notice you can contact our Data Protection Officer on the contact details noted below.

Why do we collect data about you?

When you collect Covid-19 Test Kits we collect personal data from you which is information which can be used to identify you.

We will process your personal data where processing is necessary to provide you with Covid-19 Test Kits. We may also process your personal data where we need to protect your interests (or someone else's interest), or to fulfil a legal obligation.

We will only process "special categories of data" about ethnic origin, political opinions, religious or similar beliefs, trade union membership, health or sex life where we either have your explicit consent, or if we are legally required or have another valid lawful basis to do so.

Our lawful bases for the collecting and processing of this data are:

UK General Data Protection Regulation (GDPR) Article 6(1)(e) (lawful basis to permit the processing of personal data) processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authorities vested in the data controllers.

UK GDPR Article 9(2)(j) (lawful basis to permit the processing of special category data) processing is necessary for archiving purposes in the public interest, or scientific and historical research purposes.

Data Protection Principles

We will comply with the six data protection principles in the GDPR, which say that personal data must be:

1. processed fairly and lawfully and in a transparent manner;
2. collected for specified, explicit and legitimate purposes and processed in accordance with such purposes;
3. adequate, relevant and not excessive for the purpose;
4. accurate;
5. not kept longer than necessary; and
6. processed in a way that protects the integrity and confidentiality of the personal data.

We shall ensure we can show that we have complied with the data protection principles.

Sharing your Data

Dundee and Angus College will routinely share the personal data collected in the course of issuing you with Covid-19 Test Kits. Your data may be shared with authorised agencies and public health authorities of Scotland and the UK, for example but not limited to: Scottish Government; Public Health Scotland; The Department for Health and Social Care; NHS Services Scotland. The data is shared for the following purposes:

- to perform their public duties and functions,
- to administer the processing of your LFD results,
- to enable contact tracing,
- to share the test outcome with other parties involved in this process, such as local Health Boards so they can provide you with appropriate advice and support.

Also, where we are legally bound to share information, for example with a court or law enforcement agency, subject to the appropriate exemptions, we may do so. We may also share your data where we believe it is appropriate to protect you or others from serious harm.

Any sharing of data is subject to appropriate safeguards to protect your data.

How long will we keep your Data?

The data we collect in relation to the issue of your Covid-19 Test Kits will be retained by us for up to 2 years.

Your Data Rights

You may have the following rights over your data, which are set out in the GDPR. These rights are not automatic and are dependent on the provisions of the GDPR. If you are unsure of your rights or wish to exercise any of your rights, you may contact the College's [Data Protection Officer](#). You may have rights to:

- Request access to your personal data;
- Request that we make corrections to your data if it is not accurate;
- Request that we erase your data (under certain circumstances as detailed in GDPR)
- Object to us processing your data or to ask us to stop processing your data (under certain circumstances);
- Withdraw consent for processing (only where consent is the lawful basis for processing your data);
- Complain to the Information Commissioner's Office;
- Know whether your data is collected to satisfy a statutory or contractual requirement and the consequences of you not providing personal data;
- Be told whether your data is used for automated decision making, including profiling, the logic involved and the consequences of the decision making (if appropriate); and
- Be told if processing beyond the original purpose of the collection of your data is to be carried out.

Data Protection & Security

We will only process your personal data for the specific purpose or purposes notified to you in this document. Your personal data will only be processed to the extent that it is necessary for the specific purposes notified to you. We will keep the personal data we store about you accurate and up to date. Data that is inaccurate or out of date will be destroyed or updated. Please notify us if your personal details change or you become aware of inaccuracies in the personal data we hold about you. The College will process your data only in accordance with the GDPR, this Privacy Notice and in adherence to the College's Data Protection Policy and other relevant policies. The College will take appropriate technical and organisational measures to protect the rights of Data Subjects. In the event of a data breach which results in high risk to your rights and freedoms, we shall communicate the nature of that breach to you including our contact details, the likely consequences of the data breach and details of the measures taken or which we plan to take to address the data breach and to mitigate its consequences.

Data Protection Officer

If you have any questions relating to your personal data, its processing or your rights as a Data Subject, you should contact the College's Data Protection Officer in the first instance:

Data Protection Officer
Dundee & Angus College
Old Glamis Road
DUNDEE
DD3 8LE

dataprotection@dundeeandangus.ac.uk

Should you be unsatisfied or you believe that your data is not being processed in accordance with the Data Protection Act or the GDPR, you may complain to the Information Commissioner's Office (ICO). Further information, including contact details can be found on the ICO's website at <https://ico.org.uk/for-the-public/>.