



Lewes District Council



Working in partnership with **Eastbourne Homes**

Privacy Notice

Processing of Personal Data for Coronavirus test and trace purposes

What data are we processing and why?

The UK is currently experiencing a public health emergency as a result of the coronavirus (COVID-19) pandemic. It is therefore critical that organisations take a range of measures to keep everyone safe.

The restrictions on social contact required under public health regulations are being supported by the NHS test and trace scheme. To facilitate this scheme, Lewes and Eastbourne Councils ('the Councils') are taking a number of measures, including:

- keeping a temporary record of our visitors' names and contact details for 21 days so that, in the event of a local outbreak of the virus, this data may be used to assist NHS test and trace as needed
- assisting the NHS and Public Health England (PHE) with tracing individuals who (i) have tested positive for COVID-19; or (ii) may have come into contact with a person who has tested positive.

Taking these measures should help to contain clusters or outbreaks of the virus.

We anticipate that the categories of data will be limited to:

- your name
- your postal address
- your email address
- your telephone number

What is the legal basis for our use of your personal data?

Article 6(1)(e) of the General Data Protection Regulation provides the lawful basis for the processing that would be necessary to support the purposes described above.

Article 6(1)(e) permits data processing that is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the data controller (i.e. the Councils).

Who will your personal data be shared with?

Your data will be shared with the NHS and/or PHE, in the event of a formal request, to support the test and trace scheme. We may also share it with East Sussex County Council (ESCC) if the request for tracing information has come from them as

part of their own support for the NHS scheme. We may from time to time share your data with other bodies with a genuine need to know for the purposes described above, and –

- on a case by case basis
- using the minimum personal data necessary
- with the appropriate security controls in place

How long will we hold your data for?

Visitor information which is collected and stored solely for NHS Test and Trace scheme will be retained for 21 days. This reflects the incubation period for COVID-19 (which can be up to 14 days) and an additional 7 days to allow time for testing and tracing. After 21 days, this visitor information will be securely disposed of or deleted.

If the contact details we supply to the NHS, PHE or ESCC at their request are sourced from the customer databases we hold as part of our delivery or administration of a core Council service (for example council tax or housing), we will continue to hold those details for that core purpose.

Your rights

- You are entitled to request a copy of any information about you that we hold
- If the information we hold about you is inaccurate you have a right to have this corrected and you have the right to request completion of incomplete data
- You have the right to request that we stop, or restrict the processing of your personal data, in certain circumstances. Where possible, we will seek to comply with your request, but we may be required to hold or process information to comply with a legal requirement
- You have the right to object to the processing of your personal data in certain circumstances. We may still be required to hold or process information if there are legitimate grounds for doing so

Identity of data controller

The data controller is Lewes District Council and Eastbourne Borough Council, whose postal address is: Eastbourne Town Hall, Grove Road, Eastbourne, BN21 4UG.

If you are dissatisfied with how the Councils have used your personal information you have a right to complain to the Information Commissioner's Office at casework@ico.org.uk

Identity of Data Protection Officer

Oliver Dixon, Senior Lawyer

Contact details

Eastbourne Town Hall, Grove Road, Eastbourne,
BN21 4UG

Email: accesstoinformation@lewes-eastbourne.gov.uk

Tel: 01323 410000