

# COVID-19 Asymptomatic (rapid) testing Privacy Notice

## About us

This Privacy Notice explains the nature of the personal information that the University of Reading and Henley Business School processes for the purposes of booking your COVID-19 rapid test.

The University of Reading and Henley Business School (**We** or **Us**) are data controller in respect of the information that We process about your booking. Our contact details are The University of Reading, Information Management and Policy Services, Room 2.22, Whiteknights House, Shinfield Road, Whiteknights, Reading RG6 6DT.

United Kingdom. Tel: +44 (0) 118 378 8981.

This notice also contains a link to the Privacy Notice of the Department of Health and Social Care (DHSC) which explains the nature of the personal information that the DHSC processes for the purposes of testing for COVID-19 and Test and Trace. The DHSC are data controller in respect of the information that is gathered when you register for your test and your test results. Please be advised that although University staff may assist with your rapid test, the DHSC have responsibility for your registration data and results and you should consult the [DHSC Privacy Notice](#) for more information about DHSC uses of your data.

Your privacy is important to Us, so if there is anything in this privacy notice that is unclear or you do not understand, please contact Our Data Protection Officer at: [imps@reading.ac.uk](mailto:imps@reading.ac.uk).

This notice explains what personal information We collect, hold, and share in support the purposes of

- Booking your rapid test appointment

This notice also informs you of your rights in respect of the data We hold about you and where you can go for more information.

## Data We collect about you

To facilitate the booking of appointments for COVID-19 rapid tests We need to collect, record, store, use, share, retain and destroy (this is known as 'processing') the personal data of our staff, students and visitors.

- your full name
- your email address
- your contact telephone number
- your address (optional)
- your student number/ID
- confirmation of your age
- date and time of booked appointment

- Details of any accessibility needs

If We require a parent, guardian or carer to provide consent on your behalf in order to take part in the rapid test, We will also collect the below:

- Name and relationship of parent/guardian or carer
- a record of consent

**This data is used for the purposes of:**

- Booking your allocated time slot at the rapid testing centre
- Recording any necessary consents
- Ensuring you can access the service
- Identifying those who have used the rapid testing service
- Assisting with University outbreak control measures.

We will also use anonymised and aggregated statistical data for the purposes of monitoring use and effectiveness of the rapid test service.

## Who we share your data with

**The Department of Health and Social Care,**

The DHSC will receive details of your booking for the purposes of administering your rapid test.

We will only share data with DHSC if it is deemed necessary, and if We are satisfied that We have a lawful basis for this sharing.

At the point the DHSC receive your personal data from Us, DHSC will become the data controller and responsible for your data.

If there are any reasons that you do not qualify for the rapid test, these details will not be shared.

We may also share anonymised and aggregated statistical data with Public Health England and relevant Local Authorities for the purposes of monitoring use and effectiveness of the rapid test service.

**Providers of our services working on behalf of the University**

We also use third party providers to deliver our services, such as externally hosted software providers that We use to manage bookings. These providers act only on the instructions of the University and are not permitted to make any further uses of your data and must keep your data secure.

## Our lawful basis for uses of your data

Under data protection laws We must have a legitimate and lawful basis for processing your personal data. There are several lawful grounds within data protection law, here the General Data Protection Regulation (GDPR) and Data Protection Act 2018 (DPA), that apply to the different data that We are processing for identifying contacts and University outbreak response and control purposes. These are explained below:

GDPR 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.

GDPR Article 9(2)(i): the processing is necessary for reasons of public interest in the area of public health

DPA 2018 - Schedule 1, Part 1, s.3: the processing is necessary for the protection of public health

DPA 2018 - Schedule 1, Part 1, (2)(2)(f): the processing is necessary for health or social care purposes

DPA 2018 - Schedule 1, Part 2 (6): the processing is necessary for statutory or government purposes

Covid-19 Asymptomatic (rapid) Testing Privacy Notice Nov 2020\_UNRESTRICTED\_V1.0

## How We protect your data

Your personal information will be stored securely within the University and our staff are trained in the secure handling of personal information. All those involved in collecting and using data for purposes connected to COVID-19 will be responsible for ensuring the security and retention of your data. Limited designated University staff will be responsible for the secure transfer of your information between internal teams and departments and to any parties that We share data with, where required.

Wherever the purposes can be met without the use of personally identifying data, anonymised data will be used. Where the processing of personal data is strictly necessary, that data will be limited to the minimum required to meet those purposes.

Processing of personal data for the purposes will be undertaken under the supervision and on advice of the University Data Protection Officer.

## Retention of your data

Details of your rapid test appointment booking will be retained for a limited period following your test. After this point We may retain anonymised and aggregated statistical data for the purposes of monitoring use and effectiveness of the rapid test service.

If We were required to collect any necessary consents these will be retained for a maximum of 3 years.

Any data collected for the purposes of registering for your test and your test results will be held by the DHSC and will be subject to retention periods as stated with the DHSC privacy notice. Any enquiries regarding data held by the DHSC should be routed to DHSC's data protection officer who can be contacted at [data\\_protection@dhsc.gov.uk](mailto:data_protection@dhsc.gov.uk).

## Your rights

Under data protection law you have the right to:

- Withdraw your consent where that is the legal basis of our processing
- Access your personal data that We process
- Rectify inaccuracies in personal data that We hold about you
- Be erased, that is your details to be removed from systems that We use to process your personal data
- Restrict the processing in certain ways
- Obtain a copy of your data in a commonly used electronic form; and
- Object to certain processing of your personal data by Us

Please see the ICO website for further information on the above rights:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

If you would like to exercise your rights, or have any concerns regarding how We have handled your personal information please contact our Data Protection Office at [imps@reading.ac.uk](mailto:imps@reading.ac.uk)

Some rights are dependent on the lawful basis for processing your information. If We have legitimate grounds to not carry out your wishes, these will be explained to you in response to your request.

You also have the right to complain to the Information Commissioner's Office.

## Questions about this notice

If there is anything in this notice that you are unclear about, please contact our Data Protection Officer, on the contact details below, who shall be happy to answer any queries you may have concerning this privacy notice or the way in which We process your personal data.

By mail: The University of Reading, Information Management and Policy Services, Room 2.22, Whiteknights House, Shinfield Road, Whiteknights, Reading RG6 6DT

By email: [imps@reading.ac.uk](mailto:imps@reading.ac.uk)

By phone: United Kingdom. Tel: +44 (0) 118 378 8981.

Complaints can be referred to the Information Commissioners Office, the independent body who oversee Data Protection compliance in the UK.

Web: <https://ico.org.uk/make-a-complaint/>

More information on Contact and Trace and Data Protection can also be found here:

<https://ico.org.uk/global/data-protection-and-coronavirus-information-hub/>

## Changes to this notice

We keep our privacy notice under regular review to ensure best practice and compliance with the law. This privacy notice was last updated on 24/11/2020.

We may change this privacy notice from time to time. If We make significant changes in the way We treat your personal information We will make this clear on our website and may seek to notify you directly.

## How to contact us

If you have any questions about this notice, our University Data Protection Officer can be contacted at:

IMPS

Telephone: United Kingdom. Tel: +44 (0) 118 378 8981.

Email: [imps@reading.ac.uk](mailto:imps@reading.ac.uk)