# Privacy Notice – Covid-19 Arrangements

At ACCORD, we are committed to protecting your personal information and privacy. We comply with all legislation regarding the collection and use of personal data. This Privacy Notice describes how we collect and use your personal information.

If you have any queries about this Privacy Notice, please contact our nominated Data Protection Officer (DPO) on 0141 581 2000 ext 203 or dpo@accord.org.uk.

# ACCORD Hospice

In this Privacy Notice, ‘ACCORD Hospice’ means ACCORD Hospice (registered as a charity in Scotland, No SC013682 and a company limited by guarantee (SC092520) with our offices at 7 Morton Avenue, Paisley PA2 7BW. We are registered with the Information Commissioner’s Office, registration reference Z6995209.

# When We Collect Personal Information

We are recording the name and contact details of everyone who visits the hospice to support NHS Scotland’s Test and Protect. This information will be used to enable NHS Scotland 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 stopping the spread. This information is recorded in a visitors’ register in the inpatient unit or in our contractor’s register at Reception.

# The Personal Information We Collect

The types of information we might collect from visitors will include names, postal addresses and contact phone numbers and/or email addresses. We will collect sufficient information such that it will allow us to get in touch with you if required, either directly or indirectly. We will not typically collect personal-sensitive information as we are processing your personal data in order to assist with NHS Scotland’s Test and Protect strategy in relation to the coronavirus public health epidemic. This will involve the gathering and, when required, the sharing of information with NHS Scotland as the responsible body for Test and Protect. **Your data will not be used for any other purpose.** In order to assist in the containment of the virus, we will only share your data when it is requested directly by NHS Scotland. This will only be in the unlikely event there is a cluster of coronavirus cases linked to this location. Information will be transferred securely to NHS National Services Scotland who will use the data to contact-trace those who were in the building at the same time as the positive case, and will provide guidance and support to those who may be advised to self-isolate.

# Lawful Basis and Purpose

Under data protection law, we have a number of lawful bases that allow us to collect, process and share personal information. In this case, the lawful basis for processing your data is ‘legal obligation'. In short, we are obliged to process the personal data to comply with the law which requires us to collect your data and share it with public health officers if they request it under The Health Protection (Coronavirus) (Restrictions) (Scotland) Amendment (No. 11) Regulations 2020.

Your personal data collected for the purposes stated in this privacy notice will be held by us for at least 3 weeks (21 days). All personal data will be held and disposed of in a safe and secure manner.

**We will never share your data with any other third party unless required by law.**

# Data Security

ACCORD is committed to keeping your personal information safe and secure and we have security policies and technical measures in place to help protect your information.

Unfortunately, no data transmission over the internet can be guaranteed 100% secure. As a result, while we strive to protect your personal information, ACCORD cannot ensure or warrant the security of any information you transmit to us, and you do so at your own risk.

## Your Rights

You have the following rights with regard to the data we store about you:

1. The right to be informed
2. The right of access
3. The right to rectification
4. The right to erase
5. The right to restrict processing
6. The right to data portability
7. The right to object
8. Rights in relation to automated decision making and profiling (we do not use automated decision making or profiling).

If you wish to exercise any of these rights please contact our Data Protection Officer on 0141 581 2000 Ext 203 or dpo@accord.org.uk for more information. You can contact us in any way you deem appropriate but our preferred approach is via email (dpo@accord.org.uk) as this allows us to ensure that all such requests (we call them “Data Subject Action Requests”) can be dealt with promptly, efficiently and within the statutory timescales which we are given. We require proof of your identity in order for us to deal with your request, so please make sure this is provided to us. We will respond to any requests as quickly as we can, but definitely within 28 days. However, we reserve the right to refuse (or charge for) requests which we deem to be unfounded or excessive. If we do so, we will notify you of our reasons for doing so (again within 28 days). You have a right to complain to the supervisory authority and to seek a judicial remedy if you are unhappy with our response to your request so if after speaking to us you are unhappy with our use of your personal data, you have the right to complain to the Information Commissioner’s Office.

## Updated – August 2021