



Privacy Notice Covid19 Addendum - September 2020

As a result of the worldwide Coronavirus pandemic, we may need to record information regarding whether you are displaying any symptoms of COVID-19, have been in recent contact with anyone who has tested positive or is displaying symptoms of COVID-19, have any underlying health conditions or have, or are in close contact with anyone who has, been advised to shield. This information would be required to ensure the safety of members attending Monifieth Swim Club.

Why we need your data

Our lawful basis for processing health information relating to COVID19 is:

- to protect your vital interests; and/or
- for the legitimate interests of members attending Monifieth Swim Club to ensure individuals' safety and prevent the spread of the virus.

As health information falls within the definition of "special categories of personal data" under applicable data protection legislation (DPA18), we also need a special condition to process such information. We may need to process this health information:

- to protect your vital interests where you cannot consent;
- for reasons of public interest in the area of public health, including protecting against serious cross-border threats to health where we have a legal duty of confidentiality to you; and/or
- with your explicit consent (if required).

Information we may collect about you

We may collect data from you in relation to COVID-19:

- From a return to water self declaration and/or a regular health check survey – detailing whether you have symptoms of COVID-19, if you have come into contact with someone with COVID-19, history of having COVID-19, and underlying health conditions.
- Should you report contracting COVID-19 through to the COVID Officer or Club Committee Member.

Who we share your personal data with

We may be required to share personal information with statutory or regulatory authorities and organisations to comply with public health obligations. This may



include but is not exclusive to the Scottish Government and local NHS Test and Protect Teams. In the event that we do share personal information with third parties, we will only share such personal information as is strictly required for the specific purposes and take reasonable steps to ensure that recipients shall only process the disclosed personal information in accordance with those purposes.

Where a case of COVID19 is recorded within the club, your personal information will not be shared with other members directly, however members will be advised that a case has occurred, whilst keeping personal information anonymous as far as possible.

How long will we store COVID19 specific data?

We will only keep your personal information for as long as necessary in line with legal obligations. Laws or regulation may set a minimum period for which we have to keep your personal information.