

Best Western Heath Court Hotel
GDPR Policy for NHS/ Hotel Test & Trace Data

Recording customer details: how we use your information

To support NHS Test and Trace (which is part of the Department for Health and Social Care) in England, DHSC has provided guidance which we have chosen to follow. The guidance recommends that we collect and keep a limited record of staff, customers and visitors who come onto our premises for the purpose of contact tracing.

By maintaining records of staff, customers and visitors, and sharing these with NHS Test and Trace where requested, we can help to identify people who may have been exposed to coronavirus.

As a customer or visitor of Kris Hospitality Co. Limited T/A Heath Court Hotel you will be asked to provide some basic information and contact details. The following information will be collected:

- the names of all customers or visitors
- a contact phone number/ email address for each customer or visitor
- date of visit

We are the data controllers for the collection of your personal data, and will be responsible for compliance with data protection legislation for the period of time it holds the information. If that information is requested by the NHS Test and Trace service, the service would at this point be responsible for compliance with data protection legislation for that period of time. NHS Test and Trace as part of safeguarding your personal data, has in place technical, organisational and administrative security measures to protect your personal information that it receives from the venue or establishment, that it holds from loss, misuse, and unauthorised access, disclosure, alteration and destruction.

NHS Test and Trace as part of its guidance, has recommended that we retain this information for 21 days from the date of your visit, to enable contact tracing to be carried out by NHS Test and Trace during that period. We will only share information with NHS Test and Trace if it is specifically requested by them. For example, if other customers at the venue subsequently tested positive, NHS Test and Trace can request the log of customer, visitor and staff details on a particular day.

Under government guidance, the information we collect may include information which we would not ordinarily collect from you and which we therefore collect only for the purpose of contact tracing. Information of this type will not be used for other purposes, and NHS Test and Trace will not disclose this information to any third party unless required to do so by law (for example, as a result of receiving a court

order). In addition, where the information is only collected for the purpose of contact tracing it will be destroyed by us 21 days after the date of your visit.

However, the government guidance may also cover information that we would usually collect and hold onto as part of our ordinary dealings with you (perhaps, for example, your name and phone number). Where this is the case, this information only will continue to be held after 21 days and we will use it as we usually would, unless and until you tell us not to.

Your information will always be stored and used in compliance with the relevant data protection legislation. The use of your information is covered by the UK General Data Protection Regulations Article 6 (1) (f) – legitimate interests of the venue or establishment. The legitimate interest in this case is the interest of the venue/establishment in co-operating with NHS Test and Trace in order to help maintain a safe operating environment and to help fight any local outbreak of coronavirus.

Collection of information from or about children under the age of 18 requires the consent of their parent or guardian.

By law, you have a number of rights as a data subject, such as the, right to be informed, the right to access information held about you, the right to rectification on any inaccurate data that we hold about you. You have the right to request that we erase personal data about you that we hold (although this is not an absolute right). You have the right to request that we restrict processing of personal data about you that we hold in certain circumstances. You have the right to object to processing of personal data about you on grounds relating to your particular situation (also again this right is not absolute). If you are unhappy or wish to complain about how your information is used, you should contact a member of staff in the first instance to resolve your issue.

How records will be maintained

To support NHS Test and Trace, we will hold electronic records for 21 days before securely deleting them. When deleting of data, we will do so in a way that does not risk unintended access (E.g. ensuring permanent deletion of electronic files).

Records which are made and kept for other business purposes do not need to be disposed of after 21 days. Only data related to a record that is created solely for the purpose of NHS Test and Trace needs to be destroyed at this point. All collected data will comply with UK GDPR and will not be kept for longer than is necessary.

Data Protection Regulation Legislation

The data that we collect is personal data and will be handled in accordance with data protection legislation to protect the privacy of our staff, customers and visitors.

GDPR allows us to request contact information from our staff, customers and visitors and share it with NHS Test and Trace to help minimise the transmission of COVID-19 and support public health and safety. It is not necessary for us to seek consent

from each person, but we make clear why the information is being collected and what we intend to do with it.

For resident guests, data will be obtained electronically from the guest registration process. This will be retained in accordance with current legislation.

We do not have to inform every customer individually, as we display a notice at the Hotel and on your website setting out what the data will be used for and the circumstances in which it might be accessed by NHS Test and Trace

Personal data that is collected for NHS Test and Trace, will only be used only to share with NHS Test and Trace and not be used for other purposes, including marketing, profiling, analysis or other purposes unrelated to contact tracing,

We make our staff aware of what they should and shouldn't do with customer information. We will not misuse the data in a way that is misleading or could cause an unjustified negative impact on people, for example to discriminate against groups of individuals.