

Covid-19 Testing Privacy Notice

This Covid-19 Testing Privacy Notice explains how the Wellcome Sanger Institute / Genome Research Limited (“GRL” or “we”), as Data Controller, handle your personal data in connection with Covid-19 diagnostic testing. It also provides details of the rights that you have under data protection law. Such laws, for the avoidance of doubt, include the UK General Data Protection Regulation and the Data Protection Act 2018.

This Covid-19 Testing Privacy Notice is provided to you, whether or not you are GRL staff, because you are working on the Wellcome Genome Campus (“Campus”) and need to have a Covid-19 test.

Our contact details

Genome Research Limited
Wellcome Genome Campus, Hinxton Cambridge CB10 1SA
dataprotection@sanger.ac.uk
sanger.ac.uk

What type of data we collect about you

We will collect your name, date of birth, age, phone number, email address and home postal address. We may also collect your NHS number if you choose to provide it. If you are a contractor, we will additionally collect your employer’s name and your manager’s name, email address and phone number.

We will process your test samples (e.g., nose and throat swab) and test results.

With the exception of test results, this personal data will be collected directly from you. Test results will be received from the Francis Crick Institute, which will carry out the Covid-19 testing. If your test is positive, we may also ask you for the locations you have visited on Campus and the names of any people with whom you have been in contact.

Purposes and legal grounds for processing

Due to of the current pandemic, all persons working on Campus more than one day must undergo regular testing for Covid-19. We process your personal data based on our legitimate interest in ensuring safety and security of those working on Campus. We process special category personal data (health data revealing that someone has Covid-19) on the basis that this is necessary for GRL to provide a safe work environment and assess the working capacity of its staff.

What we do with the data and who we share it with

Your personal data is shared with the Francis Crick Institute, who carry out the Covid-19 diagnostic testing in conjunction with Health Services Laboratory (HSL). HSL will share positive test results with Public Health England. More data protection information about the Francis Crick Institute’s Covid-19 testing programme can be found here: <https://www.crick.ac.uk/about-us/privacy-policy>.

Positive test results will also be shared with a specially-formed GRL Covid Response Team, which will perform a contact tracing exercise on Campus for any positive tests and take steps to make the Campus safe. If you are contractor who has tested positive, your positive test results will also be shared with your employer for purposes of the tracing exercise.

How we store your data and when we delete it

Your data is stored securely on the Francis Crick Institute's appointment management platform (ServiceNow) and, where necessary, in GRL systems. We will retain your data for as long as required for the purposes detailed in this notice, after which time it will be deleted in accordance with our internal retention policies.

Your data protection rights

You may have the right to request access, rectification or erasure, amongst other rights, in relation to your personal data.

Any request to exercise one of these rights will be assessed by us on a case by case basis. There may be circumstances in which we are not legally required to comply with a request because of relevant exemptions provided for in applicable data protection legislation. If we are required to comply, we have one month to respond in most cases.

Please contact us at dataprotection@sanger.ac.uk if you wish to make a request.

How to complain

If you have concerns about how we have handled your personal data, you should get in contact with us at dataprotection@sanger.ac.uk in the first instance. If you are dissatisfied with our response, you have the right to complain to your Data Protection Authority. In the UK, that is the Information Commissioner's Office (ICO).

The ICO's contact details:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
Helpline number: 0303 123 1113

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

Thank you for helping us stay safe on Campus.