



## Privacy notice – Test and Protect at play sessions

### Who we are:

Play Midlothian is a Scottish Registered Charity (no. SC025474) and a Company Limited by Guarantee (no. SC240729). Our registered office address is Gorebridge Beacon, Hunterfield Road, Gorebridge, EH23 4TT. If you would like to find out more please contact the Managing Director on 01875 820 889 or visit [www.playmidlothian.org.uk](http://www.playmidlothian.org.uk).

### Introduction:

We are committed to ensuring that any personal data we hold about you is protected in accordance with data protection laws – including the General Data Protection regulation (GDPR) – and is used in line with your expectations.

This privacy notice explains why we collect your personal data, how we use it and how we protect it.

### Why we collect personal data from you:

For the health and safety of the participants and staff at our services, we are recording the name and contact details of everyone who takes part to support NHS Scotland's efforts in tackling COVID-19. For further information on the NHS Scotland Test and Protect strategy please visit the NHS website at <https://www.informationgovernance.scot.nhs.uk/use-of-your-data-for-track-trace-isolate-tti/>

This will involve the gathering and, when necessary, the sharing of information with NHS Scotland and statutory partners. Your data gathered specifically for the purposes of Test and Protect will not be used for any other purpose. ***(In signing up for our services you may also have provided data for other purposes, for example to join our mailing list, or to book sessions – the other privacy notices on our website apply in those cases, therefore please also refer to them.)***

Along with the date and time of you and/or your child participating in a session, we will collect the following personal data if applicable:

- your name; and
- contact telephone number.

If you do not have a telephone number, you have the option to provide:

- a postal address; or
- an email address.

This information will be used to enable NHS Scotland and statutory partners to contact you should you have been at one of our sessions 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.

Under data protection law, GDPR Article 6(1), we have a number of lawful bases that allow us to collect and process personal information. In this case, the lawful basis for processing your data is '**legitimate interests**'. Broadly speaking 'legitimate interests' means that we can process your personal information if we have a genuine and legitimate reason and we are not harming any of your rights and interests.

Our legitimate reason for processing your data is to assist with NHS Scotland's Test and Protect strategy in relation to the coronavirus public health epidemic.

Before sharing any information we will carefully consider and balance any potential impact on you and your rights.

### **Who we share your data with:**

If necessary, NHS Scotland and statutory partners in relation to the Test and Protect system, in order to assist in the containment of the virus. We will only share your data when it is requested directly by NHS Scotland and statutory partners.

We may share your data with others providing Play Midlothian with business services, for example the following categories:

- IT service providers (including databases and form/survey tools)
- Freelancers (for example assisting us with running our services)

The above would only be for the purposes of administering records for the Test and Protect system.

We will also share your data:

- If we are legally required to do so, for example, by law, by a court, by the Office of the Scottish Charity Regulator or by Companies House
- To enforce or apply the terms and conditions of your contract with us
- To protect children, for example by sharing information with social work or the police
- If it is necessary to protect our or others' rights, property or safety
- If we transfer the management of Play Midlothian

At times, this may include transfer of your data outside of the EU (for example, for use of an IT service), when this complies with the relevant provisions under the GDPR.

### **How we keep your personal data:**

Your personal data supplied only for Test and Protect will be retained only for the purposes stated in this privacy notice. In most cases we will have collected Test and Protect data to facilitate children's longer term participation in our services, to avoid needing to collect this data from a parent/carer again for every individual session. Therefore, we will retain it for the duration of the Test and Protect system, or until you contact our data protection lead (as per the details at the top of this notice) to advise us your child will no longer be attending sessions.

***(If you have provided Play Midlothian the same personal data in relation to other purposes, for example to book services or join our mailing list, your data would be retained for the duration required for those purposes, and you will need to refer to our other privacy notices.)***

In some cases, for example for reasons of child protection, we may be obliged to keep your data for longer to comply with legal requirements.

We maintain appropriate technical and organisational measures to ensure the security of people's data.

### **Your rights with respect to your data:**

You have the right to request:

- Access to your personal data
- To have inaccurate personal data rectified, or completed if it is incomplete

- To restrict our processing of your data (in certain circumstances)
- Erasure of your data (but never child protection data)

You also have the right to object to our processing of your data, outlining the reasons why you are objecting. In those cases, we would weigh up whether our legitimate grounds for processing the data override the objection, or vice versa.

If you wish to exercise any of these rights at any time, or if you have any questions, comments or concerns about this privacy notice, or how we handle your data, please contact us.

If you continue to have concerns about the way your data is handled and remain dissatisfied after raising your concern with us, you have the right to complain to the Information Commissioner's Office (ICO). The ICO can be contacted at Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF or via [www.ico.org.uk](http://www.ico.org.uk)

**Changes to this notice:**

We keep this notice under regular review and may update it.