



# Stratford College

Co-educational Secondary School

## Stratford College COVID 19 Privacy Notice

### Privacy Notice

This privacy notice explains how Stratford College will process personal data specifically with regard to the Coronavirus (COVID-19) pandemic.

This privacy notice is in addition to Stratford College's existing Privacy Notices available upon request from the office on here: <https://www.stratfordcollege.ie/site-info/cookie-privacy-statement> which contains more information on how we collect, use and protect personal data generally, as well as your rights as a data subject.

### Processing Activity

The information Stratford College collects on individuals will only be used for the specific purpose for which it has been collected - to protect the workplace from infection and potentially notify individuals should Stratford College become aware of a subsequent infection.

The information will be held securely and only retained for the particular purpose of collection.

You may have provided personal information to Stratford College for a specific reason. However we may need to collect additional personal information, including sensitive personal information that you have not already supplied – specifically any underlying illnesses or vulnerabilities.

Please see Stratford College Data Protection Policy which sets out how this information will be handled. <https://www.stratfordcollege.ie/content/files/Stratford-College-Data-Protection-Policy-2019.pdf>

**Lawful bases-** our lawful bases for processing your personal information are:

- where processing is necessary in order to protect the vital interests of yourself or another person (Article 6(1)(d) and 9(2)(c) GDPR);
- where processing is necessary for the reasons of substantial public interest (Article 9(2)(g) GDPR);
- where processing is necessary in the interests of public health (Article 9(2)(i) GDPR).

Recital 46 of the GDPR states 'Some types of processing may serve both important grounds of public interest and the vital interests of the data subject as for instance when processing is necessary for humanitarian purposes, including for monitoring epidemics and their spread.....'

**Reasons for processing-** some of the information collected and shared is classified as special category personal data (health indicators). This is processed for reasons of substantial public interest under legislation and where necessary for us to fulfil our legal obligations and regulatory requirements during the COVID-19 pandemic.

**Data sharing** – We will protect your privacy and confidentiality and will only share personal information where necessary to provide support. We may rely on a number of exemptions, which allow us to share information without needing to comply with all the rights and obligations under GDPR.

**Retention period** - we will hold your data for the duration of the COVID -19 pandemic and until notification from Government that there is no longer a pandemic and this data may be destroyed.

**Anonymisation** - your personal information may be converted ('anonymised') into statistical or aggregated data in such a way that ensures that you cannot be identified from it. Aggregated data cannot, by definition, be linked back to you as an individual and may be used to conduct research and analysis, including the preparation of statistics for use in our reports.

We will not sell your personal information to third parties.

**Right to object** - where processing your personal information is required for the performance of a public interest task (see our lawful bases above), you have the right to object on 'grounds relating to your particular situation'. We will have to demonstrate why it is appropriate for us to continue to use your personal data.

**Changes to this Privacy Notice** - we will review this Covid 19 Privacy Notice as necessary and will place updates on our website.

**Further information** - <https://www.dataprotection.ie/en/news-media/blogs/data-protection-and-covid-19>

If you would like to discuss anything in this notice please contact the Principal at [admin@stratfordcollege.ie](mailto:admin@stratfordcollege.ie)

19<sup>th</sup> June 2020