

Privacy Notice for Workplace Lateral Flow Testing

Who is collecting and using your personal data?

Pennon Group (or subsidiaries) is collecting and or processing your personal data as a Data Controller under Data Protection Legislation and our ICO registration number is Z4569666. This privacy notice concerns the processing of personal data that takes place by Pennon Group plc for the purposes of undertaking Workplace Lateral Flow (Coronavirus) testing, contact tracing and anonymised reporting.

This notice explains what information we collect, why we collect it and how we keep it secure. It also explains your rights and our legal obligation. Should you wish to find out more about Pennon Group's data protection policies please contact our [Data Protection Officer](#).

We will notify you of any changes to this privacy notice

This privacy notice was last updated 05/03/2021. If we need to use your personal data for any new purposes that are not set out in this document, updates will be made to this notice and changes communicated, in accordance with current data protection legislation. Any queries relating to this privacy notice please contact our [Data Protection Officer](#).

What information are we processing?

We will collect, store and process information about you which will include:

- your name
- your work telephone number(s)
- your work email address
- Your Covid -19 Lateral Flow Test date
- Your Covid-19 Lateral Flow Test result – either positive, negative or void

Purpose of collecting or processing your personal data

To book an appointment for Workplace testing for Covid-19, to collect Covid-19 Lateral Flow test results.

The legal basis for us collecting your personal data

The legal basis for collecting and processing your personal data is Consent.

We are using the information you give us to facilitate your request for a Lateral Flow Test for coronavirus, contact tracing and anonymised reporting. You can withdraw your consent at any time by contacting our [Occupational Health Advisor](#) or our [Data Protection Officer](#).

The information we collect will be used to book your appointment date/time/slot and to provide you with that information; it will also be used to support our Covid response planning. When you take your Lateral Flow Test you will be asked to register with the NHS Test and Trace programme, where you will need to input your details into the government website.

Once you have had your test, your anonymised results will be used for business planning, to help prevent the spread of Covid-19 in the workforce and to ensure that essential services maintain adequate cover. As part of the testing process your results will be provided to the national NHS Test and Trace system as described above. Your results will be provided by text or email from the NHS Test & Trace service. A positive test result may trigger contact from the Pennon COVID-19 team and/or

NHS Test and Trace contact team. More information about how the national Test and Trace service will use your personal data is available from the [National Test and Trace Privacy Notice](#).

We will not use the information for any other purpose than set out in this privacy notice and will not disclose it to a third party i.e. other companies or individuals, unless we are required to do so by law for the protection of public health, prevention of crime and detection of fraud, or, in some circumstances, when we feel that you or others are at risk.

Personal data that is collected for the purposes outlined in this notice will not be used for direct marketing purposes and will not be sold on to any other third parties.

Recipients or categories of recipients that we may share your personal data with

Pennon Group will not share the personal data you supply to us under this privacy notices for the purpose of Covid-19 Lateral Flow Testing with any third-party organisations.

We will keep the information and test results you give us in the Pennon Group secure booking system, which can only be accessed by authorised staff who require access to this data for the purposes of administering your request for a coronavirus Lateral Flow Test, contact tracing and anonymised reporting.

International transfers

Pennon will not transfer your personal data, provided under this privacy notices for the purpose of Covid-19 Lateral Flow Testing, to countries outside the EEA.

How long will we hold your personal data?

Pennon will retain your personal data, provided under this privacy notices for the purpose of Covid-19 Lateral Flow Testing, until the government declares the pandemic to be over. When this occurs data relating to these test result will be deleted.

Your data protection rights

Under data protection law, you have rights including:

Your right of access - You have the right to ask us for copies of your personal information.

Your right to rectification - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances.

Your right to restriction of processing - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

Your right to object to processing - You have the the right to object to the processing of your personal information in certain circumstances.

Your right to data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact us at dataprotection@pennon-group.co.uk if you wish to make a request.

Complaints

If you have any concerns about our use of your personal information, you can make a complaint to us at dataprotection@pennon-group.co.uk

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>