



ALEXANDRA COLLEGE

DUBLIN

Covid-19 Privacy Statement

1. Introduction

- a. This privacy notice explains how Alexandra College will process personal data specifically with regard to the Coronavirus (COVID-19) pandemic.
- b. This privacy notice is in addition to Alexandra College's existing Privacy Notices

2. Processing Activity

- a. The information Alexandra College collects on individuals will only be used for the specific purpose for which it has been collected - to protect the workplace from introduction and/or spread of infection and potentially notify individuals if Alexandra College becomes aware of a subsequent infection and subject always to public health advice and regulation.
- b. The information collected will be held securely and only retained for the particular purpose of collection. 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 Alexandra College Data Protection Policy which sets out how this information will be handled.

3. Lawful bases

The lawful bases for processing your personal information are:

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

4. Reasons for processing

Data including special category personal data is processed by the College for reasons of substantial public interest under legislation and to enable us to fulfil our legal obligations and regulatory requirements during the COVID-19 pandemic.

5. Data sharing

We only share personal information where necessary to provide support for example to the HSE. 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.

6. 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 that this data may be destroyed.

7. Anonymisation

Your personal information may be converted into statistical or aggregated data in such a way that ensures that you cannot be identified from it. Aggregated data cannot 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.

8. Changes to this Privacy Notice

We will review this Covid 19 Privacy Notice as necessary.

October 2020