



Anna Valley  
AV Policy/Covid 19 NHS Track and Trace Policy  
Version: 1  
Sept 2020

## **Anna Valley Ltd Recording Customer Details: How we use your information**

To support NHS Test and Trace (which is part of the Department for Health and Social Care) in England, Anna Valley Ltd has decided to collect and keep a limited record of staff, customers and visitors who come onto our premises for the purpose of contract tracing.

By maintaining records of staff, customers and visitors, and sharing these with NHS Test and Trace where requested, we can help to identify people who may have been exposed to the Coronavirus.

As a customer/visitor of Anna Valley Ltd you will be asked to provide some basic information and contact details. The following information will be collected:

- The names of all customers or visitors, or if it is a group of people, the name of one member of the group.
- A contact phone number for each customer or visitor, or for the lead member of a group of people.
- Date of visit and arrival and departure time.

In addition, if you only interact with one member of staff during your visit, the name of the assigned staff member will be recorded alongside your information.

NHS Test and Trace have asked us to retain this information for 21 days from the date of your visit, to enable contact tracing to be carried out by NHS Test and Trace during that period. We will only share information with NHS Test and Trace if it is specifically requested by them. For example, if another customer at the venue reported symptoms and subsequently tested positive, NHS Test and Trace can request the log of customer details for a particular time period (e.g.: this may be all customers who visited on a particular day or time-band, or over a two-day period).

We may/will require you to pre-book appointments.



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Under government guidance, the information we collect may include information which we would not ordinarily collect from you and which we therefore collect only for the purpose of contact tracing. Information of this type will not be used for other purposes (such as surveillance of an individual's movements or marketing activities), and NHS Test and Trace will not disclose this information to any third party unless required to do so by law (e.g. as a result of receiving a court order). In addition, where the information is only collected for the purpose of contact tracing it will be destroyed by us 21 days after the date of your visit.

However, the government guidance may also cover information that we would usually collect and hold onto as part of our ordinary dealings with you (perhaps, for example, your name, date of birth and phone number). Where this is the case, this information only will continue to be held after 21 days and we will use it as usually would, unless and until you tell us not to.

Your information will always be stored and used in compliance with the relevant data protection legislation.

The use of your information is covered by the General Data Protection Regulations Article 6 (1) (f) – legitimate interests of the venue/establishment. The legitimate interest in this case is the interest of the venue/establishment in co-operating with NHS Test and Trace in order to help maintain a safe operating environment and to help fight any local outbreak of coronavirus.

If you do not wish your contact information to be passed to NHS Test and Trace if requested, please speak to Jenny Bigrave – Facilities and Compliance Manager

By law, you have a number of rights as a data subject, such as the right to access information held about you. If you are unhappy or wish to complain about how your information is used, you should contact a member of staff in the first instance to resolve your issue.

If you are still not satisfied, you can complain to the Information Commissioner's Office. Their website address is [www.ico.org.uk](http://www.ico.org.uk)