

## Covid-19 Privacy Notice

This privacy notice is an addendum to Barrow Consultancy & Training Ltd. (hereafter Barrow Training)'s main Privacy Notice (QF790) and it explains how Barrow Training (as Data Controller) may use your personal data, specifically in relation to the Covid-19 (Coronavirus) pandemic.

At this time, we seek to collect and process special category personal data in response to the recent outbreak of Covid-19, which is in addition to the data that would ordinarily be collected from you by Barrow Training. This additional personal data being collected includes whether you, as a data subject, have experienced, or are experiencing, Covid-19 symptoms, are in any of the high-risk categories which are most vulnerable to become infected and/or seriously ill, have been advised by a doctor to isolate or cocoon, have been in close contact with someone who has diagnosis of suspected, or confirmed, Covid-19, and if you have returned to Ireland from another country within the past 14 days.

You will be asked for this information on the Barrow Training Covid-19 Self-Declaration (QF796). You will be asked to leave if you answer yes to any of the questions on this form. Failure to co-operate will also result in your being asked to leave.

The purpose of collecting this data is to ensure the safety and well-being of our employees, learners and the general public and to comply with Government guidelines and legislation regarding employees returning to work etc. The information sought from you is limited to what is proportionate and necessary, taking into account the latest guidance issued by the Government and health professionals, in order to manage and contain the virus.

The General Data Protection Regulation (GDPR) requires specific legal conditions to be met to ensure that the processing of personal data is lawful. The conditions relevant to the Barrow Training processing of the data in question are:

- Article 6 (1) (c) – processing is necessary for compliance with a legal obligation to which the controller is subject.
- Article 6(1)(d) – processing is necessary in order to protect the vital interests of the data subject or another natural person. Recital 46 adds that "some 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".
- Article 6(1)(e) – is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

Additionally, the processing of special categories of personal data, which includes data concerning a person's health, are prohibited unless specific further conditions can be met. These further conditions relevant to Barrow Training's processing of the data in question are:

- Article 9(2)(b) – processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law in so far as it is authorised by Union or Member State law or a collective agreement pursuant to Member State law providing for appropriate safeguards for the fundamental rights and the interests of the data subject.

- Article 9(2)(i) – processing is necessary for reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health or ensuring high standards of quality and safety of health care.

In this current pandemic, we may share your information with other public authorities and emergency services; when necessary in a proportionate and secure manner. Contact with you to obtain consent before sharing will not be required where consent is not the legal basis for processing such data, as set out above.

Please be assured that protection of personal data remains a priority at this time. We will only share your personal information where the law allows, and we always aim to share the minimum data necessary to achieve the purpose required.

The information will not be shared outside the EEA.

Further, the information will only be used for the purposes mentioned in this Privacy Notice and Barrow Training's Data Protection Policy. Therefore, health information provided by you in relation to the outbreak of Covid-19/Coronavirus will not be used for any other purpose.

Such health information will also only be retained for limited specific times. That is, we will only keep your information for as long as it is necessary, taking into account Government advice and the ongoing risk presented by Covid-19/Coronavirus. When the information is no longer needed for this purpose, it will be securely deleted and/or shredded.

We do not engage in automated decision making/profiling. You have rights with respect to your personal data, which remain intact during the coronavirus pandemic.

Further information on Data Protection at Barrow Training may be viewed at <https://www.barrowtraining.ie/about/data-protection>. You can contact Barrow Training's Data Protection Officer at [info@barrowtraining.ie](mailto:info@barrowtraining.ie) or by writing to Data Protection Officer, Barrow Training, High Street, Bagenalstown, Co. Carlow, R21 TH22.