



Privacy Notice - COVID-19 Testing service

Cardiff University will process personal data for the purposes of delivering a COVID-19 testing service. In line with the requirements of Data Protection legislation, this privacy notice sets out the way in which personal data will be processed for the provision of this service, including associated guidance and support.

Data Controller

Cardiff University is considered the Data Controller of the personal data which you provide and as such is legally responsible for processing your personal data in accordance with data protection legislation.

The University is registered as a Data Controller with the Information Commissioner's Office (ICO) to process personal data. [Reg no Z6549747](#).

Contact Details of the Data Protection Officer

The University is required to have a data protection officer who can be contacted if you have any queries, concerns or complaints about the way your personal data is processed. Cardiff University's Data Protection Officer can be contacted on InfoRequest@cardiff.ac.uk

What personal data will we collect?

Cardiff University will require the following personal data in order to carry out the service:

- Name; contact details; confirmation of any existing coronavirus symptoms, positive tests within the last 12 weeks. Other information may also be asked for where you have requested the test in preparation for international travel.

How will it be used and shared?

The personal data will be used to arrange appointments; to conduct and process testing; to provide results to public health authorities; and, to notify individuals of test results.

Where necessary, Cardiff University will use the personal data to provide guidance and support on the next steps. As such, personal data relating to positive test results will be available to those teams required to provide such guidance and support – for example, Student Wellbeing.

Where an individual receives a void test result, they will be asked to undertake a further test as soon as possible.

Where an individual produces a positive test result, the result message will direct them to the Gov.Wales to follow the latest guidance including isolation requirements. Individuals will also be directed towards SIMS / CORE HR to update their own personal University records.

In the event that your test shows a positive result, Cardiff University has a legal obligation to report this to the public health authorities. The personal data which we are required to report at the time of writing comprises your name, sex, date of birth, NHS number, address (home address and current residence if this is not your home address) and ethnicity. Where the testing is related to travel then we may also be required to report details of this.

Cardiff University reports this data to Public Health England, Public Health Wales and Test, Trace & Protect services. This reporting is for the purpose of helping to manage the pandemic in the UK. As it is a legal obligation on Cardiff University your specific consent to this sharing of data is not required and hence if you do not wish to have your results shared in this way then you should not have the test.

Cardiff University will use personal data relating to positive and negative test results for planning and forecasting purposes, including identification of clusters of positive tests that might require further consideration. Wherever possible, personal identifiers included in the data (such as names) will be removed before use.

As part of the booking form, you will be asked whether you wish to be contacted about future research opportunities carried out by Cardiff University. If you consent, you will be able to withdraw your consent. In the event that you are contacted about future research, you will also be provided with further information about the research to allow you to make an informed decision.

What is the legal basis for processing your personal data?

Cardiff University will process personal data under one or more of the following bases set out in Data Protection law:

Basis	Explanation
Public task	Cardiff University may process personal data where doing so is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in Cardiff University.
Legitimate interests	Other than in the performance of the public task, Cardiff University will process personal data for legitimate interests (namely, the screening for and monitoring of COVID-19). The processing will not override individuals' rights, freedoms and interests.
Vital interests	Cardiff University will process personal data where doing so is necessary to protect the vital interests of an individual.
Legal obligation	Cardiff University will process personal data in order to comply with legal obligations, such as the statutory duty to notify public health authorities of positive results for SARS-COV-2 as a notifiable cause
Consent	Cardiff University will process personal data on the basis of an individual's consent in situations where the above lawful bases do not apply. This basis will only apply where the University has requested consent – for example, to take part in future research. Where this basis is used, the individual has the right to withdraw consent using the contact details on this notice. The basis does not apply to the day to day operation of the COVID-19 screening service.

Is personal data transferred outside of the European Economic Area?

Wherever possible, your personal data will be processed within the European Economic Area, as permitted by law. In some circumstances, it might be necessary to transfer your personal data outside of the European Economic Area – for example, where a particular IT supplier stores personal data outside of the European Economic Area. In the event of such a transfer outside of the European Economic Area, appropriate safeguards (such as Standard Contract Clauses) will be put in place and processing will be based on the documented instructions of Cardiff University.

How long will your personal data be held?

Cardiff University will retain your personal data in line with the general retention periods set out in the published data Retention Schedule that can be seen [here](#). Your personal data will be held by those areas of Cardiff University involved in the provision of this service, including associated guidance and support, for a period of time determined by the pandemic.

Your rights

Under data protection legislation, you have certain rights which will be associated with the legal basis on which we process your data. For further information please see the following guidance published by the [Information Commissioner's Office](#). You can exercise these rights by using the contact details provided on this notice. The Information Commissioner's office is responsible for regulating data protection in the UK. We hope to resolve any of your questions, queries or concerns but if you remain dissatisfied you can contact [the Information Commissioner's Office](#).