

Privacy Notice

Covid - 19 Services

Screen4 are providing (COVID-19) services in the form of self-test kits or Clinician performed testing. Screen4 will be the data controller for the purposes of Data Protection legislation when purchases are made by individuals. Screen4 decides what information is required and how it needs to be used based on the type of product purchased. Screen4 will also be the data processor for the purposes of Data Protection legislation when entering into a contract with Clients. Screen4 will be instructed how to handle Client data in line with our current privacy policy.

Other organisations also carry out parts of the COVID-19 testing service on behalf of Screen4 but can only act on instructions provided to them by us. These organisations are known as data processors. Such an organisation is DPD Local who are our nominated provider to assist with the delivery of the test kits.

The categories of information we collect, hold and share include, but are not limited to:

- Personal information (such as name, address, mobile number, post code, Date of birth,)
- Characteristics (such as ethnicity, nationality, gender)
- Identification Information (such as passport number)

Special Categories

Previously known as sensitive personal data, this means data about an individual which is more sensitive,

The special categories of data we hold are:

- Health Record (such as the Laboratory test result)
- Ethnicity

Who will collect/handle your data:

Data will be collected and handled by:

- Covid-19 sample collectors (Clinicians)
- Administration staff
- Customer Service Advisors
- Laboratory – when a sample is received and declared as belonging to a patient
- Safe4 Account – when an account is registered to report a patients' results.
- Real Digital International – Covid test kit fulfilment
- DPD Local – delivery of test kits

Legal basis under GDPR and Data Protection Act 2018

- processing personal data is necessary for the performance of a contract
- or if requested by the data subject, for the preparatory steps to enter into a contract.
This request does not have to be expressly worded – if prospective patients and/or clients complete a purchase to use the services of Screen4 Ltd, then their request to process the data is implied.
- **Article 6(1)(b)** - the processing is necessary for the performance of a contract to which the data subject is a party; or. In order to take steps at the request of the data subject prior to entering into a contract.

When collecting Special Category Data

- **Article 9(2)(h)** – the processing is necessary for the management of health/social care systems or services/ medical diagnosis.
- Data Protection Act 2018 – Schedule 1, Part 1, (2) (2) (f) – health or social care purposes.

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Why is it collected

- For the purposes of providing the information required to declare a patient's Covid 19 sample and result to the laboratory for analysis and to Public Health England.
- For the purposes of providing a Fit to Fly certificate to allow travel.
- For the purposes of complying to the obligations set by DHSC and Public Health England when providing Covid 19 testing services for Day 2 and Day 8 (International Travel into the UK).
- For the purposes of providing a result for the Test to Release programme.

The information will be used

- To comply where there is a legal obligation to process the data in relation to your Covid 19 test result.
- To comply to our obligations as a Covid 19 service provider.
- To comply with the requirements set by Public Health England for all results
- Data may also be used for research, audit or statistics as required by the Laboratory and Public Health England

Data is collected from

- Forms completed on www.screen4.org when making a purchase.
- By email
- By telephone

Length of time Data is held

We will only keep your personal data for as long as we need it to carry out our services and to respond to an enquiry, complaint or legal requirement. Most of the time we will keep information in accordance with the time periods specified in the [Records Management Code of Practice for Health and Social Care 2016](#) which is 8 years for general medical records. Other organisations involved in processing your data will be doing so in accordance with our terms of service that we instruct them to provide and the agreement they have in place with DHSC, Public Health England or legal requirement to provide that service.

To confirm the retention policies of the third-party providers we use to offer Screen4 services, please refer to the organisations policies direct as advised below:

- Laboratory - <https://www.oncologica.com/cookie-law-privacy-policy/>
- DPD Local - <https://www.dpd.co.uk/gdpr.pdf>

Any requests for exercising your rights with third-party providers of whom we have shared data with may have a different legal basis of why they are required to retain your data, in this case, you will need to request with the organisations direct. The contact information will be found on the above links.

How will my information be stored

Your information will be stored on a secure electronic management system which complies with GDPR regulations, paper records will be stored in lockable metal cabinets with restricted access. Controls have been put in place to ensure staff are trained to protect your privacy and have a genuine business need to have access to it.

Who will my information be shared with

Covid 19 results will be sent to those individuals as indicated on the order when purchased. Any children under the age of 16 will have had a guardian consent to the test at the point of order and therefore has accepted responsibility for the receipt of the results for the child.

Once an order is placed and you have received a confirmation/order number, you are instructing Screen4 to initiate the Covid 19 services as informed on www.screen4.org, which includes, but is not limited to, sharing your personal information to the listed third-party providers below. We do this in order to comply to our obligations set in our terms

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and conditions, but also to abide by the instructions you have given us, and the obligations set by DHSC and Public Health England when complying with the Law.

List of Organisations who will receive your personal data to aid Screen4 in providing the Covid 19 Services.

1. Laboratory - <https://www.oncologica.com/> (it is the Laboratory's obligation to share your personal data, upon their agreements with the third parties, noted at point 5. (PHE) and 6. (DHSC). Screen4 do not share your personal data direct to these third parties)
1. Safe4 Account - <https://s4encrypt.uk/>
2. Real Digital International - <https://real-digital.co.uk/>
3. DPD Local - <https://www.dpdlocal.co.uk/>
4. PHE - <https://www.gov.uk/government/organisations/public-health-england>
5. DHSC - <https://www.gov.uk/government/organisations/department-of-health-and-social-care>

How will my information be disposed of

Your records will be disposed of in accordance with the GDPR. Paper based information will be securely shredded and electronic data will be securely deleted from all equipment.

We will delete your personal data from our live internal systems at the end of the retention schedule. It is not always possible to do this earlier, unless a request is accepted, of which we will inform you of the timescale for this.

We do have a retention schedule of 25 days in place in relation to our backup retention policy, and that means that once your data is deleted from live systems, all new subsequent backups will supersede the current backups already stored. This means the data will remain within the backup environment for a certain period until it is overwritten. This will take 30 days from the day the live data is deleted.

Your backup data will be 'put beyond use' as it cannot be immediately overwritten. The data within the backup will not be used for any other purpose as this is simply held on our systems until it is replaced in line with our backup retention policy.

What are your rights?

You have the right to be

- Right to be informed of what data we collect via this Privacy Notice
- Right of access – you have the right to request access to your personal data at any time
- Right to rectification – you have the right to request rectification or amendment of your personal data
- Right to erasure – you have the right to request us to delete or remove your personal data and we will delete it if there is no legal reason for us to keep it, such as Health and Safety Legal requirements.
- Right to restrict processing – you have the right to request us to restrict onward processing of your personal data, including Marketing

Who to contact

If you require any further information and/or would like to request any of your rights above please contact the Data Protection Lead at dataprotection@screen4.org