

Data protection

Our [GDPR policy](#) details how we collect, use and protect personal data, as well as your rights as a data subject.

In accordance with relevant data protection law, we have a responsibility to make sure you know why and how your personal information is being collected, and to protecting information provided. This remains our commitment.

This privacy notice explains and provides information on how we collect and hold data about you in relation to the unprecedented challenges we face because of the Coronavirus pandemic (COVID-19).

What the lawful basis is for processing personal data

The EU General Data Protection Regulation (“GDPR”) requires specific conditions to be met to ensure that the processing of personal data is lawful.

GDPR already provides for legal grounds that allow employers to process personal data in the context of epidemics or pandemics without the need to obtain the consent of individuals. The relevant legal grounds include personal data processing in the public interest, or to protect an individual’s vital interests, or to comply with another legal obligation.

On 19 March, 2020, the European Data Protection Board (EDPB) published a new statement regarding processing personal data in the context of the Covid-19 outbreak. The EDPB said that the Covid-19 emergency is a legal condition which may legitimise restrictions of individual freedoms, provided that these restrictions are proportionate and limited to the emergency period.

In the case of the current Covid-19 situation, the legitimate interest is to prevent the spread of infectious diseases and to ensure workplace safety. The collection of employee health data directly relating to the symptoms of Covid-19 during the pandemic should be within the reasonable expectation of employees and well aligned with the employees’ individual interests for their well-being.

The Government has issued [advice on the sharing of data](#), they have also provided a link to [frequently asked questions about the law](#).

Why we use or process your data

We may ask you for sensitive personal data that you have not already supplied, for example, your age, or if you have any underlying illnesses or are vulnerable. This is so we can assist you and plan the work streams that enable us to operate.

We may also ask you for information to help us understand about those you live with who are suffering with, or at risk of suffering with, Covid-19; information about incidents of exposure to Covid-19 and the management of outbreaks of or the risk of Covid-19 including locating, contacting, screening, flagging and monitoring such incidents and collecting

information about and providing services in relation to testing, diagnosis, self-isolation, fitness to work, treatment, medical and social interventions and recovery from Covid-19.

Personal data will be processed for these specified and explicit purposes.

Who are we likely to share this information with?

In this current pandemic, we may share your personal data internally as well as externally with other public authorities, emergency services, and other stakeholders, as necessary and proportionate to do.

How we store your information

We will only keep your information for as long as it necessary. We will consider Government guidance and the on-going risk presented by Covid-19 and the requirement of our response to this emergency.

As a minimum, the information outlined in this privacy notice will be kept for the duration of the Covid-19 response. However, it may be kept for longer to meet evidential requirements under British statute and common law.

If possible, we will anonymise your personal data so that you cannot be identified. This cannot be done where data is needed to provide direct support to individuals.

When the information is no longer needed for Covid-19 purposes, it will be deleted.

Further information

If you have any questions about the collection or use of your personal data, you can contact our Data Protection Officer: dpo@ebor.academy