#### MIDDLESEX UNIVERSITY PRIVACY NOTICE

#### FOR STUDENT COVID TESTING BOOKING UNDER DHSC ARRANGEMENTS.

### A. Background

- The Department of Health and Social Care (DHSC), has agreed with Middlesex University to support the University running Covid 19 testing at University premises.
- The tests will be made available to students. Whether or not a test is taken is entirely a decision for the student to make.
- The testing arrangements will be run in accordance with operating procedures specified by the DHSC, but will be managed on University premises and will be supported by University staff
- The testing offers students who are **not** experiencing symptoms of Covid 19 to have a test before they leave University locations for the Christmas holiday period.
- 1. The University will be responsible for providing you with the opportunity to arrange appointments for a test. You may book for a test using the University's booking system, which is provided to the University under a service agreement with Springshare Limited. To book you will have to register your first name, last name, student ID number and email address. The University is the data controller of this personal data. It is responsible for managing the personal data to ensure that you are able to have the test at the appointed time.
- 2. At the testing site, on arrival, you will self-register your personal details on a registration portal provided by the DHSC. The information you provide at this portal is not information that the University will receive or manage. It will enable the DHSC to arrange for you to be informed of your results. To access further information on how the DHSC will handle your personal information please use the following link: <a href="https://www.gov.uk/government/publications/coronavirus-covid-19-testing-privacy-information">www.gov.uk/government/publications/coronavirus-covid-19-testing-privacy-information</a>
- 3. Test results will be notified to you by the DHSC and will not be made known to the University.
- 4. The details set out below, relate purely to the personal information that the University collects from you from your use of the booking system to book your test appointment.

#### **B.** Personal Data Processed

Personal data is collected to enable you to have an opportunity to have a Covid 19 asymptomatic test

If you book a Covid 19 Test using the University's booking system, you will enter the following personal data which the University will have access to, purely for the purpose of managing the process of enabling you to have your test at the time booked:

- your name
- your email address
- vour student ID number

## C. Processing of Personal with your Consent. (Legal Basis of Processing)

Whether or not you take a Covid 19 test is entirely a decision for you to make, and therefore you are consenting to the University using the personal information you provide to book and to manage your

booking for the Covid 19 test. The University will not have access to your test results and will not be responsible for processing your test results as these operations are run by the DHSC.

# D. Recipients

The booking data will not be shared with any other organisations or individuals without your consent. If circumstances arise which requires the University to share the personal data, the University and the person/organisation requesting the personal data would have to have a lawful basis for sharing and you would be informed.

Personal information held only for the purposes of this privacy notice will not be held more than one year unless it needs to be retained in the public interest or for the historical record.

## E. Contracting Arrangements.

We purchase a licence from a contractor, Springshare LLC to use software licensed to us and their support services. The booking system is procured under this contractual arrangement. Springshare in turn subcontracts the provision of services to a subcontractor Mailgun. Springshare remains responsible for the actions of its subcontractors. Springshare has agreed to terms and conditions in its contract with the University to ensure that it complies with the UK Data Protection law, and its contractual commitments includes maintaining appropriate technical and organisational measures in connection with the software and services it provides to ensure that persona data is kept secure and confidential.

# F. Your Rights

You have the right:

- to request information about how your personal data are processed, and to request a copy of that personal data
- to request that any inaccuracies in your personal data are rectified without delay
- to request that any incomplete personal data are completed, including by means of a supplementary statement
- to request that your personal data are erased if there is no longer a justification for them to be processed
- in certain circumstances (for example, where accuracy is contested), to request that the processing of your personal data is restricted
- to object to the processing of your personal data

### G. International transfers

The booking system does not involving processing any of your personal data outside of the European Union. If this was to change the University would have to make appropriate legal arrangements to ensure that your personal data continues to be processed lawfully, and you would be notified of any changes that have to be made to the processing.

### H. Queries and Complaints

If you have any questions or concerns about how your personal data is handled, or wish to make a complaint, in the first instance contact the University's data protection officer at:

# dpaofficer@mdx.ac.uk

If you consider that your personal data has been misused or mishandled, you may escalate your complaint (if you are not satisfied with the University's handling of your complaint) to the Information Commissioner, who is an independent regulator. The Information Commissioner can be contacted at:

Information Commissioner's Office Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF, or 0303 123 1113, or *casework@ico.org.uk*.

Any complaint to the Information Commissioner is without prejudice to your right to seek redress through the courts.

# I. Further Information on University Policies concerning Data Protection:

Student and Staff Privacy notices:

https://www.mdx.ac.uk/about-us/policies/privacy/privacy-policy-for-current-students

<u>https://www.intra.mdx.ac.uk/tools-policies/policies-and-guidance/information-governance/general-data-protection-regulation-gdpr/privacy-notice</u>

• The University's Data Protection Policy:

https://www.mdx.ac.uk/about-us/policies/privacy

• The University's Subject Access Request Policy:

https://www.mdx.ac.uk/about-us/policies

If you wish to make a request about the information the University holds about you, or about how long we hold information for, you may make a subject access request. You may request such information by emailing the Universities Data Protection Officer at: dpaofficer@mdx.ac.uk

**End of Privacy Notice**