**University of Manchester supplemental privacy notice: Student Covid-19 test booking, enquiry helpline and live chat service**

1. **Introduction**

This notice relates to any information obtained and processed by the University in connection with the student covid-19 testing enquiries helpline and live chat service.

1. **What is personal data (also known as personal information)?**

Personal information means any information which relates to or identifies you as an individual and includes opinions about you or information which may not explicitly identify you (e.g. where your name has been removed) but which nevertheless does identify you if it is combined with other information that is readily available.

1. **How does this notice relate to other information about data protection?**

This notice applies to students booking covid-19 tests facilitated by the University who make an enquiry via the helpline or live chat service and share personal data with the University staff operating the service. Further details of the processing undertaken by the University in relation to prospective students, students, staff, alumni and research participants are available from the respective [privacy notices.](https://www.manchester.ac.uk/discover/privacy-information/data-protection/privacy-notices/)

1. **Who will process my personal information?**

This notice explains how the University of Manchester will hold and process your personal information for the purposes set out. Please note that on arrival at your test appointment, you will be provided with a test kit and card and asked to register. The University will not have access to any of your registration data. You will be notified of your test result via SMS or to the email you provide when you register. The University will not see your test results.  Your personal information relating to test registration and results is processed by NHS Test and Trace. Information about how they will use your data can be found[*here*](https://www.gov.uk/government/publications/coronavirus-covid-19-testing-privacy-information)*.*

1. **What personal information will you process?**

The University will process the personal information you provide when you book a test a or make a call to the helpline or use the live chat service. This may include:

5.1. Personal contact details such as name, telephone numbers, and email addresses

5.2. Details relating to your relationship with the University

5.3. The reason for your enquiry if you call the telephone helpline or use the live chat service

5.4. Any further information about your enquiry that you choose to provide including confidential or sensitive personal details that you may disclose for us to manage any additional support needs or onwards referrals required.

1. **What is the purpose of the processing under data protection law?**

We will only use your personal information when the law allows us to do so by providing us with a legal basis or valid condition. For the purposes of facilitating your test bookings and providing support in this context, we will use your personal information in the following circumstances:

* Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests

Where you indicate that you consent to be contacted about a research study related to the testing the processing will be:

* necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller

We may also use your personal information in the following situations, which are likely to be rare:

* Where we need to protect your vital interests (or someone else's interests)

1. **Can you provide examples of processing?**

7.1. To arrange your test booking(s) and ensure that we can offer you appropriate support to deal with your enquiry

7.2. To maintain a record of your enquiry. If you use our telephone helpline the telephone number you call from will be recorded by Gamma, the contracted provider of our telephony services. This information will not be used by Gamma in to identify you or for any purpose beyond operating the service to the University.

7.3. To support any further University management relating to your call or live chat enquiry that may be required.

7.4. Conducting analysis of the bookings made and enquiries received. The appointment data, including information related to overall attendance for  test 1 and test 2 will be used to produce anonymous reports in order to evaluate the testing initiative. The reports generated will not identify you or your own test attendance or enquiry and your information will not be used for any additional purposes.

7.5. To enable us to contact you again if we need to and you agree to this

1. **What constitutes “Special Category Data”?**

The University may also process some information about you that is considered more sensitive and this is referred to as ‘special category’ personal data in the General Data Protection Regulation and Data Protection Act 2018. When we process this type of information, we are required to apply additional protections. Special category personal data is defined as racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health or sex life and sexual orientation, genetic data and biometric data which is processed to uniquely identify a person. In the UK this also includes any personal information relating to criminal convictions.

1. **How will you process my Special Category personal information or criminal convictions data?**

The helpline and lice chat service will not routinely collect or process this type of information. The helpline and enquiry service will only process special category personal information or that which refers to criminal offences or convictions in certain situations where you provide these details to us. If you do choose to disclose this type of information to us, we will use this to ensure your health and safety and provide appropriate support. Where this is the case, we will usually only use this information with your explicit consent and where this is relevant, we will discuss this with you.

In some limited circumstances we do not need your consent to process special category personal data. This only applies when we are processing it for the following purposes as these satisfy another legal condition:

* where we need to carry out our legal obligations
* where you have made the data public
* where it is necessary to protect your vital interests or those of another person and where you/they are physically or legally incapable of giving consent
* where processing is necessary for the establishment, exercise or defence of legal claims
* where it is needed to assess your working capacity on health grounds

1. **Who will my personal information be shared with?**

Your personal data will only be used within the University, except where there is a statutory requirement to share with regulatory bodies or a disclosure is required because you or another person is at risk or in danger.

1. **What are my rights in connection with my personal information?**

Under certain circumstances, by law you have the right to:

11.1. Request access to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it

11.2. Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected

11.3. Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing

11.4. Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes

11.5. Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it

11.6. Request the transfer of your personal information to another party

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

If you would like to exercise any of these rights, you should contact the University Data Protection Officer by email: [dataprotection@manchester.ac.uk](mailto:dataprotection@manchester.ac.uk). Alternatively, you can write to The Information Governance Office, University of Manchester, Christie Building, Oxford Road, Manchester M13 9PL. Further information about your rights is available from the University’s [data protection web pages](https://www.manchester.ac.uk/discover/privacy-information/data-protection/).

1. **How long is my information kept?**

We will retain the test booking and enquiry data for a period of 3 months following the end of the testing order to conduct anonymised reporting and evaluation.

1. **Who can I contact if I have any queries?**

If you have any questions about how your personal information is used by the University as a whole, or wish to exercise any of your rights, please consult the University’s [data protection web pages](https://www.manchester.ac.uk/discover/privacy-information/data-protection/). If you need further assistance, please contact the University’s Data Protection Officer ([dataprotection@manchester.ac.uk](mailto:dataprotection@manchester.ac.uk))

1. **How do I complain?**

If you are not happy with the way your information is being handled, or with the response received from us, you have the right to lodge a complaint with the Information Commissioner’s Office at Wycliffe House, Water Lane, Wilmslow, SK9 5AF (<https://ico.org.uk>).

1. **Are changes made to this notice?**

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

This Notice was last update in November 2020