Covid-19 Antibody Test – Privacy Notice

1. The purpose for which we use your personal data
We use the information we collect about you for the purpose of arranging antibody testing for COVID-19. These tests are currently for Hywel Dda University Health Board and Primary Care employees but will be rolled out to other sectors in due course.

Existing law, which allows personal information to be used and shared appropriately and lawfully in a public health emergency, is being used during this outbreak. Data Protection processes are in place to enable us to provide the right information to the right organisations in order to ensure appropriate services can be put in place as this outbreak develops. We will ensure that any information collected, used or shared is treated with the appropriate safeguards, and subject to strict controls that meet the requirements of the Data Protection Legislation.

This notice describes how Hywel Dda University Health Board may use your information to protect you and others during the Covid-19 outbreak. It supplements our main Privacy Notices which are available here.

The lawful bases for the processing of this information are:
- GDPR Article 6(1)(e) – the processing is necessary for the performance of its official tasks carried out in the public interest in providing and managing a health service
- GDPR Article 9(2)(i) – the processing is necessary for reasons of public interest in the area of public health
- Data Protection Act 2018 – Schedule 1, Part 1, (2) (2) (f) – health or social care purposes

2. What type of information do we use?
We collect the following types of personal data to deliver this service:
- Your full name
- Your date of birth
- Email address
- Mobile telephone number
- Your current place of work and normal work base
- Your vehicle registration number

3. Do we use information received from other sources?
To provide this service, we only collect personal data directly from you. We don’t obtain information about you from any other sources.

4. Who has access to your information?
We share the personal data we collect within our booking system with Hywel Dda University Health Board staff who facilitate antibody testing. When your results are available, they are securely stored electronically within a Public Health Wales computer system. From this point, a trusted partner organisation Healthcare Communications, working as a data processor on behalf of Public Health Wales will access your result and communicate it to you by text message using the mobile telephone number provided by you.

Public Health Wales will inform us if they have been unable to contact you with your results, our coordinators will then try to contact you on their behalf.

Your data will be shared with Public Health Wales and will be used for epidemiological purposes.
There are other specific situations where we may be required to disclose information about you, such as:

- Where we are required to provide the information by law
- Where disclosing the information is required to prevent or detect a crime
- Where disclosure is in the vital interests of the person concerned

5. How long we will keep your information
We will keep your information within our antibody testing booking app for 7 yrs. Your test results will be placed in your digital health record and held in accordance with our Retention Schedules.

6. Your Data Protection rights
Under the Data Protection Legislation, you have rights as an individual that you can exercise in relation to the information we hold about you:

- The right to be **Informed** – individuals have the right to be told about how their information is collected and used
- The right of **Access** – you are entitled to request access to and a copy of the information we hold about you
- The right to **Rectification** – you have the right to ask to have your information corrected

In some circumstances you may have:

- The right to **Erasure** – this is not an absolute right and will depend on the reason for processing your information
- The right to **Restrict processing** – you can ask that we stop processing your personal data, however, this may delay or prevent us from delivering a service to you. We will seek to comply with your request, but may still need to hold or process information to fulfil our legal duties
- The right to **Object** – this is not an absolute right and will depend on the reason for processing your personal information
- The right to **Data Portability** – this only applies to data processed by automated means. Health information can be accessed by relevant health professionals through a central Clinical Portal to ensure your continuity of care across our services within Wales.

7. Contact details
For more information regarding this privacy notice and your rights, please contact:

Data Protection Officer  
Hywel Dda University Health Board  
Bronglais General Hospital  
Delfryn Building  
Aberystwyth  
Ceredigion  
SY23 1ER  

Email: [dpo.hdd@wales.nhs.uk](mailto:dpo.hdd@wales.nhs.uk)

You have the right to make a complaint about the way we have processed your personal information, you can contact the Information Commissioner’s Office as the statutory body which oversees data protection law, Contact details for the Information Commissioner’s Office along with further guidance on Data Protection legislation can be found on the [ICO website](https://ico.org.uk).