

Privacy Notice – Covid-19 Lateral Flow Test

This privacy notice sets out important information about how we will collect and use personal information about you when administering the Covid-19 Lateral Flow Test to visitors to our care homes. This notice also describes what legal rights you have when we handle your information in relation to the Lateral Flow Test.

This privacy notice relates to the test known as the Lateral Flow Test and applies to all visitors to our care homes. We are the data controller in relation to information we collect about you in administering the Lateral Flow Test. The Department of Health and Social Care (DHSC) is the data controller at the point at which the test is performed.

Please take a moment to read this privacy notice. We may change this privacy notice from time to time so it is best always to check on our website for the latest version. If you have any questions, please contact us, and details about how you may do that are included below.

Who are we?

We are Elysium Healthcare. Our care homes are run by companies within our group. All these companies are registered at 2 Imperial Place, Maxwell Road, Borehamwood, WD6 1JN and their full names and registered company numbers are listed below:

Elysium Healthcare Limited (04063391)	Elysium Healthcare No.4 Limited (03257732)	Elysium Neurological Services (Badby) Limited (05558328)
Elysium Neurological Services (Adderley) Limited (09595914)	Stanley House Limited (05755615)	Elysium Healthcare (Acorn Care) Limited (03147293)
Elysium Healthcare (Ann House) Limited (08624668)	Elysium Care Partnerships No.2 Limited (05442152)	Elysium Healthcare (Healthlinc) Limited (01440442)
Elysium Healthcare (Gregory House) Limited (08943865)	Elysium Care Partnerships Limited (06045903)	Elysium Healthcare No.3 Limited (02989725)

Each of these companies may, to the extent relevant, collect, retain and use information about you and we refer to these in this privacy notice as Elysium Healthcare.

What information do we hold about you?

We hold information about you in connection with administering the Lateral Flow Test. This may include personal contact details such as name, title, addresses, telephone numbers, and personal email addresses.

We will also hold information relating to the results of your Lateral Flow Test as well as your test kit barcode - used to track your individual test, and your test registration card - used to save a copy of your barcode for your personal records. We do not have access to the information contained on the NHS Test and Trace system. Such information is exclusively available to DHSC. You can find out how DHSC use your personal data by clicking on the following link: [Testing for coronavirus privacy information](#).

How is your personal information collected?

We obtain personal information about you if you tell us that you wish to arrange a visit and we send you an email with a consent form or you complete one when you arrive at the site.

How will we use information about you?

We will only use your personal information to administer the Lateral Flow Test. This includes in relation to the outcome of the test as it will impact the visit if the result is positive, you have two void tests or

you refuse to have a test. We may also be required to inform the service user who you are planning to visit that you will not be allowed to visit on that occasion.

What is the legal basis of processing the information?

By providing Lateral Flow Testing, DHSC is managing a health service and carrying out an official task in the public interest. In order to arrange your appointment, we are required to process your personal data. This processing is considered necessary for the performance of a task in the public interest. We may also process your information because you have given us your consent to do so.

What happens if you don't want to give us your personal information?

The information we hold about you is given to us by you in order to administer the Lateral Flow Test. You do not have to participate or give us your information but you will be unable to visit as a result.

Do we share information about you to others?

Yes, we do. We will process all test results and sample data linked to the relevant test kit barcode through the NHS Test and Trace system. You will be issued with a barcode to attach to your completed test. When you pass this to the staff processing the results, the barcode will be used to upload your result.

Where we store your personal information and for how long, and how secure is it?

The information about you that we hold and use is held securely in the United Kingdom or the EU and stored in paper format and on our or NHS secure servers (or third party information technology providers).

We will not keep your personal information for longer than is necessary for the purpose. This is to ensure that information is properly managed and is available whenever and wherever there is a justified need for that information. Information will be retained for three years.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

What are your rights?

The law provides you with certain rights in relation to the information about you that we hold.

There will not usually be a charge for handling a request to exercise your rights and if we cannot comply with your request, we will usually tell you why. If you make a large number of requests or it is clear it is not reasonable for us to comply with a request, then we do not need to respond or we can charge for doing so.

Right of access - You have the right to access information held about you. This includes details of the information we hold about you and a copy of that information. The information will be provided free of charge and, unless there are grounds for extending the statutory deadline, the information will be provided to you within one month of receipt of your request. Please note we will generally also ask for confirmation of your identity and may need further information from you in order to locate the information, in which case the time period starts from the date we have that detail. Please note that in some cases we may not be able to comply fully with your request, such as where your request also involves information about someone else and it would not be fair to that other person to provide the information to you.

Right to rectification - We take reasonable steps to ensure the information we hold about you is both accurate and complete. However, you are entitled to have the information rectified if that is not the case. Unless there are grounds for extending the statutory deadline, we will respond within one month of receipt of a rectification request.

Right to erasure (sometimes referred to as the right to be 'forgotten') - In some circumstances, you have a right to have information about you 'erased' and to prevent us using or holding information about you. Please note that we do not have to comply with such a request where it is necessary to keep your information in order for us to perform tasks which are in the public interest (including public health) or for the purposes of establishing, making or defending legal claims. If you make such a request and we comply with it, please be aware that we will retain a note of your name, the request made and the date we complied with it.

Right to restrict processing - In some situations, you have a right to 'block' or suppress our holding or using information about you. As with the right to erasure, please note that we do not have to comply with such a request where it is necessary to keep your information in order for us to perform tasks which are in the public interest (including public health) or for the purposes of establishing, making or defending legal claims.

Right to data portability - You have the right to obtain and re-use your personal data for your own purposes across different services, allowing you to move, copy or transfer personal data from one IT environment to another. This right, however, only applies to personal data you have provided to us, where the processing is based on your consent or for the performance of a contract; and when the processing is carried out by automated means.

Rights relating to automated decision making - You have the right not to be subject to a decision when it is based on automated processing (i.e. by a computer alone), and it produces a legal effect or a similarly significant effect on you.

Right to withdraw consent - You have the right to withdraw consent to us holding or using information about you, but only if 'consent' is the basis for us holding or using your information.

Right to object - You have the right to object to us holding or using information about you in certain situations – where this is based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling); direct marketing (including profiling); and processing for purposes of scientific/historical research and statistics.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the Data Protection Officer in writing. She may be contacted at 2 Imperial Place, Maxwell Road, Borehamwood, WD6 1JN or email Data.Subject.Request@elysiumhealthcare.co.uk.

Complaints to the Information Commissioner's Office

You can complain to the Information Commissioner's Office (ICO) if you are unhappy with the way we have dealt with a request from you to exercise any of your rights or if you think we have not complied with our legal obligations. Whilst you do not have to do so, we would appreciate you making us aware of the issue and giving us an opportunity to respond and to address it before contacting the ICO.

Making a complaint will not affect any other legal rights or remedies that you have. More information can be found on the ICO website: <https://ico.org.uk/> and the Information Commissioner's Office can be contacted by post, phone, fax or email as follows: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF. Tel: 0303 123 1113 (local rate) or 01625 545 745 9 (national rate number); Fax: 01625 524 510; Email: casework@ico.org.uk

Keeping us informed

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes.

Data protection officer

We have appointed a data protection officer to oversee compliance with this privacy notice. If you would like to know more about anything we have said here, have any questions, or would like to exercise any rights set out in this Privacy Notice, please contact our Data Protection Officer at 2 Imperial Place, Maxwell Road, Borehamwood, WD6 1JN; Telephone: 020 8237 1800; or email IG.Info@elysiumhealthcare.co.uk. You may also contact her if you are not happy with the way we have handled your personal information.