

## DATA PROCESSING ACTIVITY RELATING TO COVID-19 PANDEMIC

The Covid-19 pandemic involves much processing of personal and confidential information in order to contain the spread and mitigate the effects of Covid-19. Processing of such data is guided or directed by the public health authorities and other relevant authorities. The legal basis for the processing of such data includes Article 6 of GDPR, and conditions permitting the processing of Special Categories of personal data, such as health data, under Article 9. Acting on the guidance / direction of public health authorities is covered under Article 9(2)(i) GDPR and Section 53 of the Data Protection Act 2018, which permits the processing of personal data, including health data, once suitable safeguards are implemented. Employers also have a legal obligation to protect employees under the Safety, Health & Welfare at Work Act 2005.

Data Type	Purpose	Category of data processed	Categories of data subjects	Categories of Recipients	Location held	Accessible by	Retention period Years <i>(Retention period is measured from last entry)</i>	Third Party Access	Legal Basis
<b>SERVICE USERS</b>									
Name / address / telephone	Infection Prevention & Control surveillance  Department of Public Health line listing for contact tracing	Personal	Service Users	Infection Prevention & Control Team Healthcare staff Occupational Health Staff	On-site	Infection Prevention & Control Team / Healthcare workers / Occ Health Staff / Admin staff	Max 2 years pending directions from Public Health	<b>Health Services Executive</b> <b>Department of Health</b> <b>Department of Public Health</b> <b>Other Infection Prevention &amp; Control teams in external healthcare facilities if transferring patients within services (case by case basis)</b>	<b>Art. 6 (f) GDPR- Legitimate interests ;</b> <b>Art. 9 2(i) Public Health;</b> <b>Health &amp; Welfare at Work Act 2005</b>
Temperature & Symptom status	COVID symptom monitoring	Confidential	Service Users	Infection Prevention & Control Team Healthcare staff	On-site	Healthcare workers / Occ Health staff	Filed in UHCR in line with HSE retention periods.	<b>Other Infection Prevention &amp; Control teams in external healthcare facilities if transferring patients within services (case by case basis)</b>	<b>Art. 6 (f) GDPR- Legitimate interests ;</b> <b>Art. 9 2(i) Public Health;</b> <b>Health &amp; Welfare at Work Act 2005</b>
Direct / Close Contact details	Infection Prevention & Control surveillance  Department of Public Health line listing for	Personal	Staff / Service Users / members of public	Infection Prevention & Control Team Healthcare staff Occupational Health Staff	On-site	Infection Prevention & Control Team / Occupational Health / Admin staff	Max 2 pending directions from Public Health	<b>Department of Public Health</b> <b>Other Infection Prevention &amp; Control teams in external healthcare facilities if transferring patients within services (case by case basis)</b>	<b>Art. 6 (f) GDPR- Legitimate interests ;</b> <b>Art. 9 2(i) Public Health;</b> <b>Health &amp; Welfare at Work Act 2005</b>

	contact tracing								
Covid-19 Test results	Infection Prevention & Control surveillance  Department of Public Health line listing for contact tracing & statutory reporting of notifiable diseases	Confidential	Service Users	Infection Prevention & Control Team Healthcare staff Occupational Health Staff	On-site	Infection Prevention & Control Team / Occupational Health / Healthcare Staff Admin Staff	Max 2 pending directions from Public Health	Health Services Executive Department of Health Department of Public Health Other Infection Prevention & Control teams in external healthcare facilities if transferring patients within services (case by case basis)	Art. 6 (f) GDPR- Legitimate interests ; Art. 9 2(i) Public Health; Health & Welfare at Work Act 2005
<b>STAFF</b>									
Name / address / telephone	Infection Prevention & Control and Occupational Health surveillance  Department of Public Health line listing for contact tracing	Personal	Staff	Occupational Health HR Staff	On-site	Infection Prevention & Control Team / Occupational Health / Admin staff / HR	Part of OH Record /HR File unless changed by staff member	Health Services Executive Department of Health Department of Public Health	Art. 6 (f) GDPR- Legitimate interests ; Art. 9 2(i) Public Health; Health & Welfare at Work Act 2005
Temperature & Symptom status	COVID symptom monitoring	Confidential	Staff	Occupational Health Line Manager	On-site	Occ Health / Line Manager	14 days	None	Art. 6 (f) GDPR- Legitimate interests ; Art. 9 2(i) Public Health; Health & Welfare at Work Act 2005
Location details	Infection Prevention & Control and Occupational Health surveillance	Personal	Staff	Healthcare staff Occupational Health Staff	On-site (location of staff workers)	Infection Prevention & Control Team / Occupational Health / Admin staff / HR / Healthcare workers/ Head of Department	Max 2 pending directions from Public Health	None	Art. 6 (f) GDPR- Legitimate interests ; Art. 9 2(i) Public Health; Health & Welfare at Work Act 2005
Location details		Personal	Staff						Art. 6 (f) GDPR- Legitimate interests ; Art. 9 2(i) Public Health;

									<b>Health &amp; Welfare at Work Act 2005</b>
Direct / Close Contact details	<p>Infection Prevention &amp; Control and Occupational Health surveillance</p> <p>HR process SAP COVID leave payments</p> <p>Department of Public Health line listing for contact tracing</p>	Personal	Staff / Service Users / members of public	Occupational Health HR Staff	On-site	Infection Prevention & Control Team / Occupational Health / Admin staff / HR	Max 2 years pending directions from Public Health and HSE Occ Health Lead	<b>Department of Public Health</b>	<b>Art. 6 (f) GDPR- Legitimate interests ; Art. 9 2(i) Public Health; Health &amp; Welfare at Work Act 2005</b>
Covid-19 Test results	<p>Infection Prevention &amp; Control and Occupational Health surveillance</p> <p>HR process SAP COVID leave payments</p> <p>Department of Public Health line listing for contact tracing &amp; statutory reporting of notifiable diseases</p>	Confidential	Staff	Occupational Health HR Staff	On-site	Infection Prevention & Control Team / Occupational Health / Healthcare Staff Admin Staff / HR	Part of the Occ Health file	<b>Department of Public Health</b>	<b>Art. 6 (f) GDPR- Legitimate interests ; Art. 9 2(i) Public Health; Health &amp; Welfare at Work Act 2005</b>