



# Coronavirus Privacy Notice

This privacy notice sets out how Fort Vale may seek to collect and hold information about you in relation to the unprecedented challenges we are all facing during the Coronavirus pandemic (COVID-19).

Fort Vale is committed to ensuring that your privacy is protected. We may seek to collect and process your personal data in response to the recent outbreak of Coronavirus, which is above and beyond what would ordinarily be collected from our employees, their dependents and visitors including onsite delivery workers, to ensure their safety and well-being.

We are required by data protection law to give you the information in this Privacy Notice. It is important that you read the Privacy Notice carefully, together with any other similar or additional information that we might give you from time to time about how we collect and use your personal data.

Such information will be limited to what is proportionate and necessary, taking into account the latest guidance issued by the Government and health professionals, in order to manage and contain the virus. It will enable the Company to effectively fulfil their functions to keep people safe, put contingency plans into place to safeguard those vulnerable and aid business continuity.

Where the information is to be used to make organisational decisions, steps will be taken to anonymise the data and general statistics/numbers used, wherever possible.

This Privacy Notice is in addition to our current data protection practices and applies from 1<sup>st</sup> March 2020 . It does not give you any contractual rights. We may update this Privacy Notice at any time.

## **Who is the controller?**

Fort Vale Engineering Ltd. – Shaun Laycock (Director)  
Fort Vale Nuclear Ltd. – Peter Staveley (General Manager)  
Fort Vale B.V. – Terry Clough (General Manager)

The above named persons are data controllers for the purposes of data protection law. These are the people responsible for how we hold and use your personal data.

## **How do we collect data?**

We only hold and use data about you that you have provided us with through correspondence - either face to face, over the phone, in writing, via our website. Surveillance data e.g. CCTV may also be collected if present on site.

## **What information is collected from you?**

We may collect, process, and keep personal data about you during your employment, site visits and when you interact with us, our products and when you purchase goods and services from us.

To help manage the current Covid 19 situation, in addition to personal data and special category data we currently process about you we may now collect the following information:

- Your name (including any honorifics and/or titles)
- Job titles and employers contact details
- Travel History
- Medical symptoms and related health data
- Copies of correspondence between us
- Dependents and/or family members medical symptoms and diagnosis
- Contact with other individuals who may have been diagnosed or have symptoms

### **What is the lawful basis for processing personal data and special category data?**

The General Data Protection Regulation requires specific conditions to be met to ensure that the processing of personal data is lawful. These relevant conditions are below:

Article 6 1 (b) processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;

Article 6 1 (c) processing is necessary for compliance with a legal obligation to which the controller is subject;

Article 6 1 (f) processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.

The processing of special categories of personal data, which include data concerning a person's health, are relevant to the employment condition in Article 9 (2) (b) of the GDPR, along with Schedule 1 of the Data Protection Act 2018. Schedule 1, Part 1(1) – is necessary for the performance or exercising obligations or rights which are imposed or conferred by law on the controller or the data subject in connection with employment, e.g. Health and Safety at Work Act 1974.

### **Security**

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we hold about you.

### **How do we use the information we hold?**

All information collected in this process is solely used for the purpose of a control measure of preventing the spread of Covid 19 and manage the public health risks. The information will be managed in a confidential manner. Where the information is to be used to make organisational decisions, steps will be taken to anonymise the data and general statistics/numbers used, wherever possible.

All information will be held securely and processed on a 'need to know' basis by only a limited number of people. Information collected in relation to Covid 19 will not be shared with anyone outside of the Fort Vale Group unless instructed under legal obligation.

For employees who may be absent from work due to Covid 19 any data processed will be managed and recorded in line then with normal absence reporting and recording procedures.

### **How long will we hold your information?**

We will keep your information only as long as it is necessary for legitimate business reasons. If you have any queries regarding this please email [dataprotection@fortvale.com](mailto:dataprotection@fortvale.com).

### **Your rights**

You have a number of legal rights relating to your personal data. If you have any questions or concerns about how your personal data is being used by us, you can contact us at [dataprotection@fortvale.com](mailto:dataprotection@fortvale.com).

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