



1. Home (<https://www.gov.uk/>)
 2. Defence and armed forces (<https://www.gov.uk/defence-and-armed-forces>)
 3. Ministry of Defence Police Privacy Notice on collection of personal data for NHS Track and Trace and NHS Scotland Trace and Protect (<https://www.gov.uk/government/publications/ministry-of-defence-police-privacy-notice-on-collection-of-personal-data-for-nhs-track-and-trace-and-nhs-scotland-trace-and-protect>)
- Ministry of Defence (<https://www.gov.uk/government/organisations/ministry-of-defence>)

Guidance

Track and Trace privacy notice

Published 21 September 2020

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1. Introduction

COVID-19 is an infectious disease affecting the whole of the country. The virus that causes COVID-19 is a coronavirus. Infectious diseases present a serious and ongoing threat to public health. If not controlled, they can infect large numbers of people and, depending on the disease and other factors, can result in ill-effects ranging from relatively minor symptoms to early death.

Contact tracing is an important way of controlling the spread of infectious diseases. It involves identifying and tracing all the people who have been in contact with a person who has been infected. Depending on the nature and duration of the contact, these contacts may require advice or treatment to prevent the disease from spreading further.

The development of the NHS Track and Trace and NHS Scotland Trace and Protect schemes are an important part of the government plan to manage Coronavirus.

2. Why we need to collect personal data

The purpose for which we, as a Force, are processing your personal data is to assist with the NHS Track and Trace and NHS Scotland Test and Protect strategy, in relation to the coronavirus public health pandemic. This will involve the gathering and, when required, the sharing of information with NHS/NHS(S), as the responsible bodies: your data will not be used for any other purpose.

3. What data we will collect

Along with the date and time of your arrival and departure in the workplace, we will collect your name and contact telephone number.

If you do not have a telephone number, you have the option to provide a postal address or an email address.

4. Our lawful basis for collecting and sharing your data

Under data protection law, GDPR Article 6(1), there are lawful bases that allow us to collect, process and share personal information. For NHS Track and Trace and NHS Scotland Trace and Protect, the lawful bases for processing your data are:

- **Article 6(1) (c) - 'legal obligation'**

MDP are obliged to process the personal data to comply with the law which requires us to collect your data and share it with public health officers, where necessary, under Section 251 of the National Health Service Act 2006 and the associated Health Service (Control of Patient Information) Regulations 2002, and The Health Protection (Coronavirus) (Restrictions) (Scotland) Amendment (No. 11) Regulations 2020

- **Article 6(1)(e) – Public Interest**

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

As information about health is a special category of personal information, a further section of the GDPR applies:

- **Article 9(2)(i)**

Processing is necessary for reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health or ensuring high standards of quality and safety of healthcare

5. How long we will retain the data

Your personal data will be retained by us for at least 3 weeks (21 days). All personal data will be held and disposed of in a safe and secure manner.

6. Your rights

As defined in the data protection law, GDPR Article(s) 12-23, you have the following rights:

- The right to be informed about the collection and use of your personal data. This is outlined above.
- The right to access the information we hold about you; also known as a Subject Access Request (SAR).
- The right to request rectification of any inaccurate personal data we hold about you. In certain circumstances exemptions to these rights may apply. Further information is available on the Information Commissioner's Office website.

7. Complaints

If you consider that your personal data has been misused or mishandled by us, you can contact our Data Protection Advisor at MDP-DPA@mod.gov.uk to raise a complaint.

If you remain dissatisfied you can make a complaint to the Information Commissioner, who is an independent regulator. The Information Commissioner can be contacted as follows:

Information Commissioner's Office Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Telephone: 0303 123 1113 **Email:** casework@ico.org.uk

Any complaint to the Information Commissioner is without prejudice to your right to seek redress through the courts.

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