



**Addendum to Privacy Policy for Clyde Nursery Ltd**  
**(August 2020)**  
**COVID-19**

As a result of the worldwide Coronavirus pandemic, we may need to record information regarding whether you are displaying any symptoms of COVID-19, have been in recent contact with anyone who has tested positive or is displaying symptoms of COVID-19, have any underlying health conditions or have, or are in close contact with anyone who has, been advised to shield. This information would be required to ensure the safety of all those attending or working at Clyde Nursery.

Why we need your data

Our lawful basis for processing health information relating to COVID-19 is:

- to protect your vital interests; and/or
- for the legitimate interests of all Children/Parents and Staff to ensure individuals' safety and prevent the spread of the virus. As health information falls within the definition of "special categories of personal data" under applicable data protection legislation, we also need a special condition to process such information.

We may need to process this health information:

- to protect your vital interests where you cannot consent.
- for reasons of public interest in the area of public health, including protecting against serious cross-border threats to health where we have a legal duty of confidentiality to you; and/or
- with your explicit consent (if required). Information we may collect about you We may collect data from you in relation to COVID-19:
  - From a regular health check survey – detailing whether you have symptoms of COVID-19, if you have come into contact with someone

with COVID-19, history of having COVID-19, and underlying health conditions.

- Should you report contracting COVID-19 to the Nursery Manager/Company Director. We may be required to share personal information with statutory or regulatory authorities and organisations to comply with public health obligations. In the event that we do share personal information with third parties, we will only share such personal information as is strictly required for the specific purposes and take reasonable steps to ensure that recipients shall only process the disclosed personal information in accordance with those purposes. Where a case of COVID-19 is recorded within the Nursery, your personal information will not be shared with other service users directly, however other service users will be advised that a case has occurred, whilst keeping personal information anonymous as far as possible.

How long will we store COVID-19 specific data?

We will only keep your personal information for as long as necessary in line with legal obligations – laws or regulation may set a minimum period for which we have to keep your personal information.