

Privacy Notice – The Lauries – Non-Invasive Temperature Testing due to COVID-19.

Temperature Checks Privacy Notice

Introduction

In response to the COVID-19 pandemic, The Lauries has made numerous changes in line with official guidance to create a safe environment for visitors to our premises. One measure is the carrying out of skin-surface temperature checks using thermal imaging cameras.

We are committed to protecting data privacy when processing your personal information. This privacy notice sets out how we collect and process the personal data captured by our thermal imaging system.

What is personal information?

Personal information is personal data which is defined by the General Data Protection Regulation (EU) 2016/679 (“GDPR”) and the Data Protection Act 2018 as “any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person”.

What information do we collect about you when we conduct surface temperature checks?

We do not store personal information about you. Your image is simply displayed in real time to our staff, with your skin-temperature reading and is deleted immediately.

Why do we conduct skin temperature checks?

The thermal cameras enable us to identify and intercept individuals displaying signs of potential fever. This facilitates our ability to reduce the risk of visitors and licensees being exposed to COVID-19 and help prevent the potential spread of COVID-19 and other contagious diseases.

What is our lawful basis for checking your surface temperature?

We rely on the 'public interest in the area of public health' condition in Article 9(2)(i) of the GDPR as the lawful basis for measuring your temperature (also referred to as DPA2018 Schedule 1 part 1 Section 3(ii)), as we have a responsibility to take certain measures to reduce the risk of visitors, licensees and staff being exposed to COVID-19.

Who do we share your skin temperature reading with?

We do not share your temperature reading with any third parties. However, where we reasonably consider you to display fever-like symptom(s), we may contact, and refer you to the organisation you are visiting for further guidance and decision as to whether you are permitted to proceed enter the building.

How and how long do we store your surface temperature reading?

We check your temperature in real-time. We do not store your temperature reading at any point. Please note that we will however keep a record that you were refused entry.

What are your rights in relation to skin temperature checks?

Under the GDPR and the Data Protection Act 2018, you have rights that we need to make you aware of:

you will not be able to request a copy of temperature measurement as the data is only available in real-time when you are within the camera capture frame (i.e., in front of the camera).

whilst you will not be able to ask Us to rectify information if you think the reading is inaccurate (as it is not stored anywhere), we will make reasonable efforts to ensure the reading is as accurate as possible, by proceeding to a second reading with a different camera, and a third reading in a cool secluded area, after you have had the chance to cool down.

you will not be able to ask Us to erase your personal information, as it will not be stored.

you can ask Us to restrict the processing of your information in certain circumstances.

you can object to the processing of your information in certain circumstances; and

you can withdraw consent for the processing of your information where this is justified, and We have no other legitimate grounds for processing it.

Contact

If you have any questions or concerns regarding your rights in respect of your personal information, please contact our dedicated Data Protection Officer at info@thelauries.org or alternatively by post at FAO: Data Protection Officer, The Lauries, 142 Claughton Road Birkenhead, Wirral, CH41 6EY

We will always review any request you make in relation to your personal information in accordance with the Data Protection Act 2018.

Complaints

If you are unsatisfied with Our response or handling of your personal information, you also have the right to make a complaint to the data protection supervisory authority in the UK, the Information Commissioner's Office ("ICO") which can be contacted through various means available on the ICO's website.

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