

12 Quick Questions: Contact-Tracing Data Collection in Pubs, Restaurants and Bars



A practical guide to help owners and managers with GDPR

What personal data will I need to collect?

Data must be relevant to the purpose of contact-tracing. It must be necessary and not excessive (e.g. one method of contact may be enough)



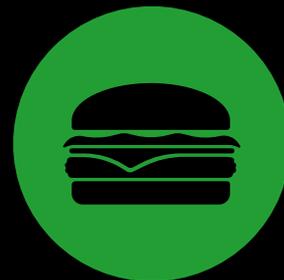
Where do I store the data?

Consider what the most appropriate system will be? Note how you will keep the data secure and how you will ensure it is deleted in line with the retention period (likely to be 21 days).



Have I identified why I need this data?

Contact-tracing. It is limited to this purpose. You must not use it for other purposes (e.g. marketing) where you don't already have this information for those purposes.



Do I already have a booking system that records this data?

If Yes: note the new purpose of contact-tracing. Consider if you need additional data or if you can manage with the data you already collect.

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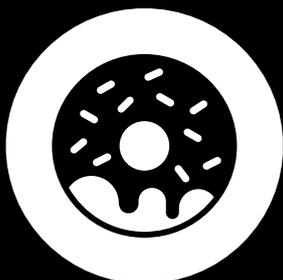
Have I updated my Privacy Policy?

It's important to be transparent with customers about how you use data. Make it easily available for them (e.g. website) and consider placing shorter versions on tables or at the entrance.



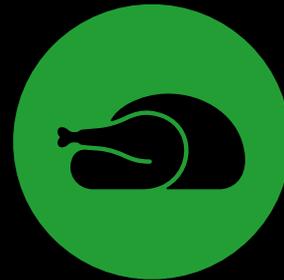
Am I introducing new Technology (e.g. Apps)?

Have I considered privacy and data protection? Poorly designed apps are likely to lead to data breaches, well-designed apps may use more data than people are comfortable with sharing. Do research and protect the privacy of your customers



Have I updated my Team?

Your team will be the ones asking people for their data. Make sure they can answer the most common questions: Why? How long will you keep it? Is it safe? Will you use it for marketing? (No!). Make sure they know who is responsible for data protection.



Am I prepared for people to ask for a copy of the data we hold?

This data collection might lead to more Subject Access Requests (SAR), not limited to the contact-tracing data. Check you have a process to handle an SAR and that your staff will recognise one.

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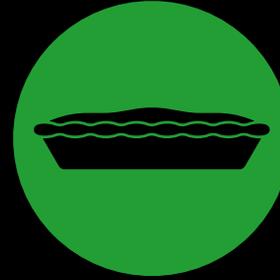
Does the nature of my business reveal any sensitive data about an individual?

Think about sexuality, political or religious beliefs here. Sharing the fact that someone has been at your establishment *may* reveal information that members of their family may not know. Consider this in mapping out your contact-tracing process.



Have I set up a review process?

Once you're back in the swing of welcoming customers, it would be easy to continue this data collection forever. It (hopefully) won't be necessary forever. Review whether or not you still need to collect it, based on Government guidance. Review on a minimum of a monthly basis.



Have I established how I will protect confidentiality of health data?

Data-sharing needs to be proportionate and necessary. You don't need to divulge the details of an individual with COVID-19 to others. Consider this in mapping out your contact tracing process.



Am I prepared to delete the data I've collected?

Consider how you ensure the data is deleted on an ongoing basis when it is no longer needed (e.g. after 21 days). Plan for how you will securely delete the data once it is no longer a requirement to collect it.