



Wave Covid-19 Customer and Visitor Privacy Notice

Introduction

This notice describes how Wave may use your personal data during the Covid-19 outbreak. It is an addendum to Wave's Corporate [Privacy Notice](#) and outlines how Wave is committed to protecting and respecting your privacy during these unprecedented challenges we are all facing during the Covid-19 pandemic.

This is above and beyond what would ordinarily be collected from our customers and visitors to ensure your health, safety and well-being whilst in Wave offices. Such information will be limited to what is proportionate and necessary, taking into account the latest guidance issued by the Government in order to manage and contain the virus.

Recording customer and visitor details: how we use your information

To support NHS Test and Trace (which is part of the Department for Health and Social Care) in England, DHSC has provided guidance which we have chosen to follow. The guidance recommends that we collect and keep a limited record of staff, customers and visitors who come onto our premises for the purpose of contact tracing.

By maintaining records of staff, customers and visitors, and sharing these with NHS Test and Trace where requested, we can help to identify people who may have been exposed to coronavirus.

As a customer or visitor wishing to visit Wave offices, you must first undertake a mandatory 'Lateral Flow Test' at home (unless you are exempt for medical reasons) and there are a number of ways you can notify us of your test result before coming on site, these are;

- Email Covid19@wave-utilities.co.uk
- Text / WhatsApp your result to your planned Wave host
- Ring or email your result to your planned Wave host
- Let the Wave reception person on arrival that you need to take a lateral flow and they will show you to a room and provide you with a lateral flow test kit.

If you test positive for Covid-19 you are advised to self-isolate at home in accordance with government guidelines.

Visitors who are delivering items to Wave reception offices are exempt from Lateral Flow Testing as you're not present for a prolonged period of time which minimises the risk of virus transmission as advised by Public Health England (PHE).

By providing a Lateral Flow Test result, this will help us to assess your suitability for entry to Wave offices in order to protect your health and safety and that of our employees and other visitors and reduce further outbreaks of Covid-19 infections. Information collected for this purpose is as follows;

- name
- test date
- test result

Following notification of a negative test result, a staff member will make necessary arrangements, such as desk booking and/or meeting rooms in advance of your attendance to Wave offices. This is for health and safety purposes outlined above.

Upon arrival to Wave offices, as part of our ongoing health measures to help keep our employees and visitors safe, we encourage the wearing of face coverings whilst moving around Wave offices (unless exempt). Furthermore, you will be asked to provide some basic information such as contact details which are outlined below;

- the names of all customers or visitors
- a contact phone number for each customer or visitor
- date of visit

Wave is the data controller for the collection of your personal data and we are responsible for compliance with data protection legislation for the period of time we hold the information. If that information is requested by the NHS Test and Trace service, the service would at that point be responsible for compliance with data protection legislation for that period of time. NHS Test and Trace as part of safeguarding your personal data, has in place technical, organisational and administrative security measures to protect your personal information that it receives from the venue or establishment, that it holds from loss, misuse, and unauthorised access, disclosure, alteration and destruction.

In addition, if you only interact with one member of staff during your visit, the name of the assigned staff member will be recorded alongside your information.

NHS Test and Trace as part of its guidance, has recommended that we retain this information for 21 days from the date of your visit, to enable contact tracing to be carried out by NHS Test and Trace during that period. We will only share information with NHS Test and Trace if it is specifically requested by them. For example, if other customers at Wave subsequently tested positive, NHS Test and Trace can request the log of customer, visitor and staff details on a particular day.

Under government guidance, NHS Test and Trace will not disclose this information to any third party unless required to do so by law (for example, as a result of receiving a court order). In addition, where the information is only collected for the purpose of contact tracing it will be destroyed by Wave 21 days after the date of your visit.

Your information will always be stored securely and used in compliance with the relevant data protection legislation. The use of your information is covered by the UK General Data Protection Regulations Article 6 (1) (f) – legitimate interests of the venue or establishment. The legitimate interest in this case is the interest of Wave in co-operating with NHS Test and Trace in order to help maintain a safe operating environment and to help fight any local outbreak of coronavirus.

For the processing of ‘special category data’, which includes data concerning a person’s health such as, a lateral flow test result, Wave must meet additional data protection safeguards, and the processing is necessary for us to comply with employment law obligations, health and safety laws (e.g. Health and Safety at Work Act 1974) and laws recently enacted by the Government in response to the Covid-19 outbreak. Such data will be retained by Wave for 6 months and then securely destroyed in accordance with our data retention policies.

Wave does not transfer your personal data outside the UK, the EU or to anywhere else.

By law, you have a number of rights as a data subject and if you would like to know more about your information rights or how to exercise them, please view our full Corporate [privacy notice](#) for further details.

If you are unhappy or wish to complain about how your information is used, you can contact our [Data Protection Officer](#) in the first instance to resolve your issue.

If you are still not satisfied, you can complain to the [Information Commissioner's Office](#)

We keep our privacy notice under regular review, and we will make new versions available on our website when required.

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