Covid-19 Contact Tracing Privacy Notice

This notice has been provided to you by the organisation responsible for processing your personal information and is intended as a supplement to that organisation's standard Privacy Notice. This notice explains how your personal information is processed during the particular circumstances around Covid19 and the Test, Trace and Protect programme. For further information about how the organisation processes your information, including your rights as a data subject and how to exercise them, you should consult their standard Privacy Notice which will be available via their website (see details below), or contact their Data Protection Officer.

Introduction

Contact tracing is a fundamental approach to public health practice and has the aim of reducing the number of secondary cases of an infectious disease in an outbreak and the consequences of infection in subsequent cases.

In this next recovery phase contact tracing will seek to achieve its aim of reducing transmission of the infection by identifying contacts who may have come into contact with the person with COVID-19 at the time the case was infectious.

More information can be found here https://gov.wales/contact-tracing-your-questions

The organisations that are processing your personal data?

Depending on where you live and the contact that you have through the contact tracing service, your data may be processed by one or more of the organisations listed below. All organisations names have the status of 'Joint Data Controller', which means that they are responsible in law for the data that they process and they are all party to an agreement across Wales that sets out how and why they process that information.

- All 22 Welsh Local Authorities
- All 7 Local Health Boards
- Public Health Wales NHS Trust
- Velindre Hospital NHS Trust (through NHS Wales Informatics Service - NWIS)
- Welsh Ambulance Service Trust

The personal data being processed

To trace the contacts of people with COVID-19, contact tracers will need to collect personal data. The data we will collect about you will include;

- Full name
- Date of birth
- Gender
- NHS number
- Full Address including postcode
- Telephone number and email address
- Details on COVID-19 symptoms
- Details on COVID-19 Test Results
- Disability and ethnicity data
- Places you've visited
- Names & Addresses of people you have been in close contact with

If the contact details of those you have been in close contact with are not known we may need to contact employers for details.

How long the personal data is kept

The data we collect for people tested positive with Covid-19 will be held for 7 years.

The data collected on contacts of people with COVID-19 but do not have any symptoms will be held for the minimum retention period of 5 years.

Test results and information related to any ongoing conditions related to Covid 19 will also reside in your electronic health record for a longer period in accordance with normal NHS retention schedules.

Information used for other purposes

Information held may also be used for:

- Understanding COVID-19 and risks to public health, trends in COVID-19 and such risks, and controlling and preventing the spread of COVID-19 and such risks
- Identifying and understanding information about patients or potential patients with or at risk of COVID-19
- Delivering services to patients, clinicians, the health services
- Research and planning in relation to COVID-19 (including potentially being invited to be part of clinical trials)
- Monitoring the progress and development of COVID-19

The legal basis for processing your personal data

The legal basis for processing your personal data for contract tracing purposes under the General Data Protection Regulation (GDPR) is:

- Article 6(1)(e) – Task carried out in the public interest or in the exercise of official authority vested in the controller

For special category data an additional legal basis is required and is:

- Article 9(2)(i) - Processing must be 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 health care and of medicinal products or medical devices)

- Article 9(2)(h) Provision of preventative or occupational medicine, health or social care or treatment, or the management of health or social care systems

Other applicable legislation

- Public Health (Control of Disease) Act 1984
- The Health Service (Control of Patient Information) Regulations 2002
- Coronavirus Act 2020
- The Health Protection (Coronavirus Restrictions) (Wales) Regulations 2020

Useful Contacts

You will find details on how the Local Health Board or Local Authority handles information from their own local privacy notices.

You can find contact details for your Local Health Board and Local Authorities by visiting

https://www.wales.nhs.uk/ourservices/directory/LocalHealthBoards

https://www.wlga.wales/welsh-local-authority-links

Public Health Wales provides specialist support, advice and leadership at a national level supported by NWIS who provide the digital platform.

If you would like further information on how Public Health Wales handles your personal data, or how we work with data processors please see our main Privacy Notice by visiting

https://phw.nhs.wales/use-of-site/privacy-notice/

If you would like further information on how NWIS handles your personal data, or how we work with data processors please see our main Privacy Notice by visiting

https://nwis.nhs.wales/use-of-site/privacy-policy/

If you have any concerns or complaints over the handling of your personal data you should in the first instance contact the Data Protection Officer at your local authority or Local Health Board, you can find this from the contacts listed above.

If however you remain unsatisfied you may complain to the Information Commissioner's Officer at the following address

Information Commissioner's Office – Wales
2nd Floor, Churchill House
Churchill Way
Cardiff
CF10 2HH
Telephone 0330 414 6421
Email: wales@ico.org.uk

Covid-19 - Olrhain Cysylltiadau - Hysbysiad Preifatrwydd

Diben yr hysbysiad hwn

Mae'r hysbysiad hwn wedi'i roi i chi gan y sefydliad sy'n gyfrifol am brosesu eich gwybodaeth bersonol ac fe'i bwriedir fel atodiad i Hysbysiad Preifatrwydd safonol y sefydliad hwnnw. Mae'r hysbysiad hwn yn esbonio sut y caiff eich gwybodaeth bersonol ei phrosesu o ran amgylchiadau Covid19 a'r rhaglen Profi, Olrhain, Diogelu. I gael mwy o wybodaeth am sut mae'r sefydliad yn prosesu eich gwybodaeth, gan gynnwys eich hawliau fel gwrthrych y data a sut i'w harfer, dylech ddarllen ei Hysbysiad Preifatrwydd safonol a fydd ar gael ar ei wefan (gweler y manylion isod), neu cysylltwch â'i Swyddog Diogelu Data.

Cyflwyniad

Mae olrhain cysylltiadau'n ddull sylfaenol o sicrhau iechyd y cyhoedd a'i nod yw lleihau nifer yr achosion eilaidd o glefyd heintus a chanlyniadau'r haint mewn achosion dilynol.

Yn y cam adfer nesaf hwn, bydd y gwaith o olrhain cysylltiadau'n ceisio cyflawni ei nod o leihau'r graddau y mae'r haint yn cael ei throsglwyddo drwy nodi cysylltiadau a allai fod wedi dod i gysylltiad â'r person â COVID-19 ar yr adeg yr oedd yr achos yn heintus.

Mae mwy o wybodaeth ar gael yma https://llyw.cymru/olrhain-cysylltiadau-eich-cwestiynau

Y sefydliadau sy'n prosesu eich data personol

Yn dibynnu ar le rydych yn byw a sut rydych yn cysylltu â'r gwasanaeth olrhain cysylltiadau, gall eich data gael ei brosesu gan un neu fwy o'r sefydliadau a restrir isod. Mae gan bob sefydliad statws 'Rheolydd Data ar y Cyd', sy'n golygu ei fod yn gyfrifol yn ôl y gyfraith am y data y mae'n ei brosesu ac y mae'n rhan o gytundeb ledled Cymru sy'n nodi sut a pham y mae'n prosesu'r wybodaeth honno.

- Y 22 Awdurdod Lleol yng Nghymru
- Y 7 Bwrdd Iechyd Lleol
- Ymddiriedolaeth GIG Iechyd Cyhoeddus Cymru
- Ymddiriedolaeth GIG Ysbyty Felindre (drwy Wasanaeth Gwybodeg GIG Cymru - GGGC)
- Ymddiriedolaeth Gwasanaeth Ambiwlans Cymru

Y data personol sy'n cael ei brosesu

Er mwyn olrhain cysylltiadau pobl â COVID-19, bydd angen i swyddogion olrhain cysylltiadau gasglu data personol. Bydd y data y byddwn yn ei gasglu amdanoch yn cynnwys;

- Enw llawn
- Dyddiad geni
- Rhyw
- Rhif GIG
- Cyfeiriad llawn gan gynnwys cod post
- Rhif ffôn a chyfeiriad e-bost
- Manylion am symptomau COVID-19
- Manylion am Ganlyniadau Prawf COVID-19
- Data anabledd ac ethnigrwydd
- Lleoedd rydych chi wedi ymweld â nhw
- Enwau a Chyfeiriadau'r bobl rydych wedi bod mewn cysylltiad agos â nhw

Os nad yw manylion cyswllt y rhai rydych wedi bod mewn cysylltiad agos â nhw'n hysbys efallai y bydd angen i ni gysylltu â chyflogwyr am fanylion.

Am faint y cedwir y data personol?

Bydd y data a gasglwn ar gyfer pobl a gafodd brawf Covid-19 positif yn cael ei gadw am 7 mlynedd.

Bydd y data a gesglir ar gysylltiadau pobl â COVID-19 ond nad oes ganddynt unrhyw symptomau yn cael ei gadw am y cyfnod cadw gofynnol o 5 mlynedd.

Bydd canlyniadau profion a gwybodaeth am unrhyw gyflyrau parhaus sy'n gysylltiedig â Covid 19 hefyd yn cael eu cadw ar eich cofnod iechyd electronig am gyfnod hwy yn unol ag amserlenni cadw arferol y GIG.

Gwybodaeth a ddefnyddir at ddibenion eraill

Gellir defnyddio gwybodaeth a gedwir hefyd ar gyfer:

- Deall COVID-19 a risgiau i iechyd y cyhoedd, tueddiadau yn COVID-19 a risgiau o'r fath, a rheoli ac atal lledaeniad COVID-19 a risgiau o'r fath
- Nodi a deall gwybodaeth am gleifion neu ddarpar gleifion sydd â COVID-19 neu sydd mewn perygl o'i ddal
- Darparu gwasanaethau i gleifion, clinigwyr, y gwasanaethau iechyd
- Ymchwil a chynllunio mewn perthynas â COVID-19 (gan gynnwys o bosibl cael gwahoddiad i fod yn rhan o dreialon clinigol)
- Monitro cynnydd a datblygiad COVID-19

Y sail gyfreithiol ar gyfer prosesu eich data personol

Y sail gyfreithiol ar gyfer prosesu eich data personol at ddibenion olrhain cysylltiadau dan y Rheoliad Diogelu Data Cyffredinol (GDPR) yw:

- Erthygl 6(1)(e) - Er mwyn cyflawni tasg a wneir er budd y cyhoedd neu wrth ymgymryd ag awdurdod swyddogol a roddir i'r rheolydd

Ar gyfer data categorïau arbennig, mae angen sail gyfreithiol ychwanegol sef:

- Erthygl 9(2)(i) - Rhaid i brosesu fod yn angenrheidiol er budd y cyhoedd ym maes iechyd y cyhoedd (megis diogelu rhag bygythiadau trawsffiniol difrifol i iechyd neu sicrhau safonau uchel o ansawdd a diogelwch gofal iechyd a chynhyrchion meddyginiaethol neu ddyfeisiau meddygol)

- Erthygl 9(2)(h) Rhoi meddyginiaeth, iechyd neu ofal cymdeithasol neu driniaeth ataliol neu alwedigaethol, neu reoli systemau iechyd neu ofal cymdeithasol

Deddfwriaeth berthnasol arall

- Deddf Iechyd y Cyhoedd (Rheoli Heintiau) 1984
- Rheoliadau'r Gwasanaeth Iechyd (Rheoli Gwybodaeth Cleifion) 2002
- Deddf y Coronafeirws 2020
- Rheoliadau Diogelu Iechyd (Cyfyngiadau'r Coronafeirws) (Cymru) 2020

Cysylltiadau Defnyddiol

Cewch fanylion ar sut mae'r Bwrdd Iechyd Lleol neu'r Awdurdod Lleol yn ymdrin â gwybodaeth ar eu hysbysiadau preifatrwydd lleol eu hunain.

Gallwch ddod o hyd i fanylion cyswllt eich Bwrdd Iechyd Lleol a'ch Awdurdodau Lleol drwy fynd i

https://www.wales.nhs.uk/eingwasanaethau/cyfeiriadur

https://www.wlga.cymru/welsh-local-authority-links

Mae Iechyd Cyhoeddus Cymru yn cynnig cymorth, cyngor ac arweiniad arbenigol ar lefel genedlaethol wedi'i gefnogi gan GGGC sy'n darparu'r llwyfan digidol.

Os hoffech fwy o wybodaeth am sut mae Iechyd Cyhoeddus Cymru yn ymdrin â'ch data personol, neu sut rydym yn gweithio gyda phroseswyr data gweler ein prif Hysbysiad Preifatrwydd yn

https://icc.gig.cymru/defnydd-y-safle/hysbysiad-preifatrwydd/

Os hoffech fwy o wybodaeth am sut mae GGGC yn ymdrin â'ch data personol, neu sut rydym yn gweithio gyda phroseswyr data gweler ein prif Hysbysiad Preifatrwydd yn

https://gggc.gig.cymru/defnyddior-wefan/polisi-preifatrwydd/

Os oes gennych unrhyw bryderon neu gwynion ynghylch y ffordd yr ymdrinnir â'ch data personol, dylech gysylltu â'r Swyddog Diogelu Data yn eich awdurdod lleol neu'ch Bwrdd Iechyd Lleol yn y lle cyntaf. Gallwch ddod o hyd i fanylion y rhain isod.

Fodd bynnag, os nad ydych yn fodlon o hyd gallwch gwyno wrth Swyddog y Comisiynydd Gwybodaeth yn y cyfeiriad canlynol

Swyddfa'r Comisiynydd Gwybodaeth - Cymru
Ail Lawr, Ty Churchill
Ffordd Churchill
Caerdydd
CF10 2HH
Ffôn 0330 414 6421
E-bost: wales@ico.org.uk