

## PRIVACY STATEMENT – TEST AND TRACE DATA

### 1 PURPOSE OF OUR PRIVACY STATEMENT

Under the Data Protection Act and the General Data Protection Regulation, we are required to explain to you why we are asking for information about you, how we intend to use the information you provide to us and whether we will share this information with anyone else.

### 2 WHO ARE WE?

We are the General Council of the Bar (known as the **Bar Council**) and we are the Data Controller. We are the approved regulator of the Bar of England and Wales, representing barristers and discharging our regulatory functions through the independent **Bar Standards Board (BSB)**. Our address is 289-293 High Holborn, London WC1V 7HZ.

### 3 OUR DATA PROTECTION OFFICER

Our Data Protection Officer is responsible for overseeing what we do with your information and monitoring our compliance with data protection laws.

If you have any concerns or questions about our use of your personal data, you can contact our Data Protection Officer at [Privacy@BarCouncil.org.uk](mailto:Privacy@BarCouncil.org.uk).

### 4 WHO IS THIS FOR?

This privacy statement is for all visitors to our office at The Bar Council, 289-293 High Holborn, London WC1V 7HZ.

### 5 WHY ARE WE COLLECTING YOUR INFORMATION?

We are collecting your information to comply with the Government's requirements relating to their Test and Trace system for Covid-19 tracing.

### 6 WHAT INFORMATION ARE WE COLLECTING?

All the information we collect about you will be stored and used by us in accordance with this privacy statement and in accordance with your rights as described in Section 13 of this statement under the Data Protection Act and the General Data Protection Regulation.

#### ***Personal data***

The information which we collect about you for the purpose of test and trace will typically be:

- your name,
- your telephone number,
- where you are from and who you are visiting, and
- the date and time you were in our office.

Also, your image may be captured on our closed-circuit television (CCTV) operating at the entrance to each of our floors, primarily for security and safety purposes. Images are viewed on a live feed and stored securely for 30 days, when they are overwritten. (See our main Privacy Statement <https://www.barcouncil.org.uk/useful-information/privacy-statement.html> CCTV Policy (<https://www.barcouncil.org.uk/uploads/assets/43897fe7-7370->

[4977-901fd4fe58a0f753/CCTV-policy-final-V10-Feb-2020.pdf](https://www.barcouncil.org.uk/4977-901fd4fe58a0f753/CCTV-policy-final-V10-Feb-2020.pdf)) for more information on how we process CCTV images).

## **7 WHAT IS THE LAWFUL BASIS FOR USING YOUR INFORMATION?**

In accordance with the data protection laws, we need a "lawful basis" for collecting and using information about you.

The lawful basis on which we rely in order to use the information which we collect about you for the purposes of Test and Trace is that it is necessary for the pursuing of legitimate interests of the General Council of the Bar.

We have carried out a legitimate interests assessment, which is available on request from the Data Protection Officer at [Privacy@BarCouncil.org.uk](mailto:Privacy@BarCouncil.org.uk).

## **8 WHAT ARE WE GOING TO DO WITH YOUR INFORMATION?**

If requested, we will share your contact details with the Test and Trace Team. We use the information you provide about where you are from and who you are meeting to determine what floor you were on and who you might have come into contact with while in our office.

## **9 SHARING YOUR INFORMATION**

As noted above, we will share contact details if requested to do so, but only after establishing that the requester is a genuine member of the Test and Trace Team.

## **10 SECURITY OF YOUR PERSONAL INFORMATION**

The information that you provide will be stored securely in our IT systems. Our security measures and procedures reflect the seriousness with which we approach security and the value we attach to your information.

Only relevant members of staff will have access to the information you provide to us. Those members of staff will have received appropriate data protection training.

## **11 CAN WE USE YOUR INFORMATION FOR ANY OTHER PURPOSE?**

No. Your contact details, obtained when you visit our office, will not be used for any other purpose. (We may hold your contact details for other purposes, which are covered in our main Privacy Statement, see <https://www.barcouncil.org.uk/useful-information/privacy-statement.html>)

## **12 STORING YOUR INFORMATION AND DELETING IT**

In accordance with the General Council of the Bar obligations under the Data Protection Legislation, we shall only retain personal data for as long as is necessary for the legitimate purposes for which the personal data is processed. The Government has advised that this period is 21 days. We will therefore securely destroy your contact details obtained for this purpose after 21 days.

## **13 YOUR RIGHTS**

Normal data protection rights apply to the data covered by this statement. In relation to this information, you are entitled, for example, to:

- see a copy of the information;
- ask us to rectify the information where it is inaccurate or is incomplete. If we agree the information is inaccurate or incomplete and make the rectification, we will inform any recipients of the information of the change, where possible; and
- ask us to erase the information, but we will not be able to comply where we hold your information to fulfil our statutory obligations.

Our obligations to comply with the above rights are subject to certain exemptions.

You also have the right to complain to the Information Commissioner's Office (the "ICO") if you are not satisfied with the way we use your information. You can contact the ICO – see <https://ico.org.uk/global/contact-us/> for details.

## **16. REVIEWING OUR PRIVACY POLICY**

This policy will be kept under review and if amended notification will be made on the Bar Council and BSB websites and on MyBar.