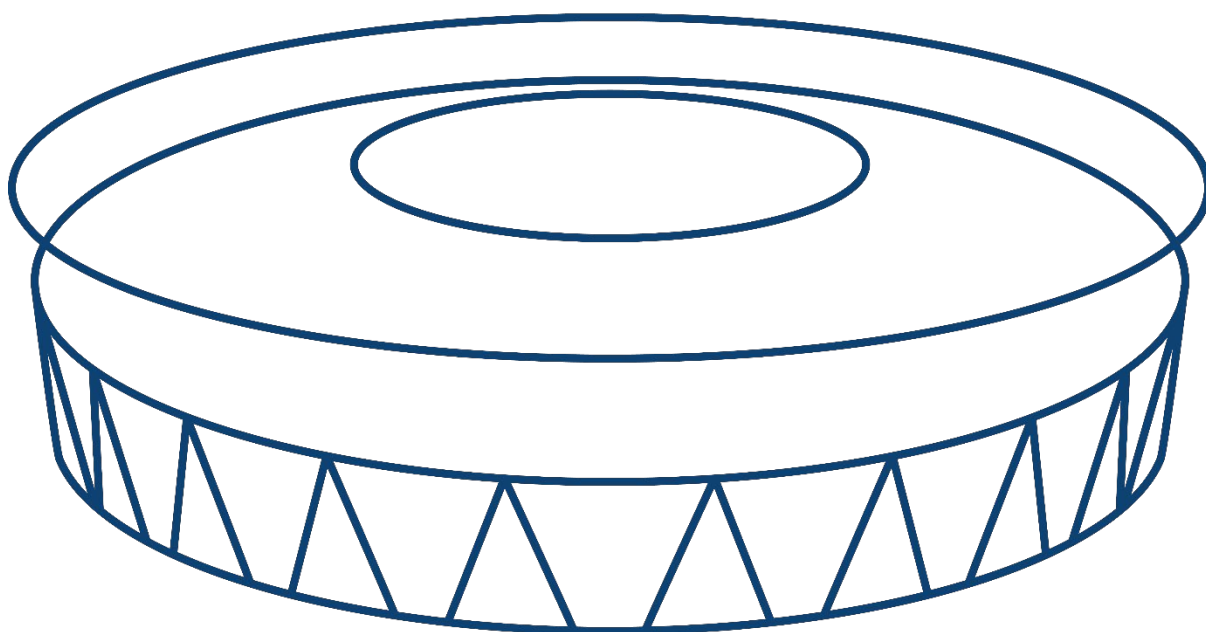


# LONDON STADIUM



## Self Declaration Privacy Notice

### Version Control

Version	Date	Description	Author
v1.0	18 June 2020	First published version	Danny Budzak

## 1. Introduction

This Privacy Notice describes the personal data which can be collected about you, why it is collected, how it may be shared in relation to access to the London Stadium during the COVID-19 pandemic. The Privacy Notice covers the use of the self-declaration screening form which has been created by LS185.

The processing of your personal data must be done in accordance with data protection legislation including the General Data Protection Regulation (2016) and the Data Protection Act (2018). These are the Data Protection laws.

For the purposes of the Data Protection Laws, LS 185 is the controller of the personal data that it processes about you. For the screening data, it is also the data processor. This Privacy Notice describes what personal data LS 185 will collect and for what purposes.

This Privacy Notice also describes what rights and freedoms you have as a data subject and how to contact LS 185 about any questions in relation to your personal data.

## 2. Why Personal Data is Being Collected

Your personal data will be collected for the purposes of screening for COVID-19 symptoms, recent contacts and recent travel overseas. This is to help with the management and control of COVID-19.

This is in accordance with guidelines issued by the Premier League as part of Project Restart. It is also becoming business best practice to use a range of measures to screen employees, workers and visitors.

## 3. What Personal Data is Being Collected

The screening data is collected through the use of an online form. The purpose of the collection is to assist with the management and control of COVID-19. A Legitimate Interest Assessment has been completed as part of the data protection compliance.

- First name
- Last name
- Company
- Date form completed
- Email
- Mobile phone number
- Details of COVID-19 symptoms
- Details of contact with someone with COVID-19
- Details of overseas travel
- Details of a negative test

## 4. Lawful Basis

LS185 has a Legitimate Interest in maintaining the health and safety of its workforce and every one who works at, or visits, the Stadium.

The relevant Articles of the General Data Protection Regulation (GDPR) are:

Article 6 – Lawfulness of processing:

- (1)(d) 'Processing is necessary in order to protect the vital interests of the data subject or other natural person'
- (1)(f) 'Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party...'

As health related data is being processed, the relevant clauses of Article 9 are also relevant:

Article 9 – Processing of Special Categories of Personal Data:

- 1 (h) 'processing is necessary for the purposes of preventive or occupational medicine, for the assessment of working capacity of the employee...'
- 1 (i) 'processing is necessary for reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health...'

A Legitimate Interest Assessment has been completed for the processing of Screening Data.

## **5. How Your Personal Data Will be Collected**

Data collected in relation to health screening will be collected through an online form. In some instances, a paper form may be used, but this will be by exception.

The data generated through the online form is collected in a spreadsheet which only authorised LS185 staff can access.

Only authorised LS185 personnel will have access to this data.

## **6. How Your Personal Data Will be Used**

Screening Data will be used to control risks in relation to COVID-19. If the answers provided suggest symptoms of COVID-19 or potential contact with COVID-19 then if you work for an agency, the agency will be notified. If you work for LS185 you will be directly notified.

## **7. Potential Sharing of Personal Data**

Data in relation to COVID-19 may be shared with the relevant health authorities. This is to assist with the management and control of infectious diseases.

## **8. Storage and Management of Your Personal Data**

Your personal data will be held in accordance with the purpose it was collected for, unless there is a legal reason for keeping it longer.

It will be kept for a period of six weeks. This is in line with Premier League guidance while restrictions are in place.

When your personal data is no longer needed, it will be securely destroyed in accordance with our retention policy which is available from [dataprotection@londonlegacy.co.uk](mailto:dataprotection@londonlegacy.co.uk)

## 9. Access to Your Personal Data and Your Rights

The Data Protection Laws give you certain rights in relation to your own personal data. These are outlined below.

**Right of access** – you can ask for copies of the personal data which is held about you

**Right to rectification**– you can ask that data is corrected if need be, and if it is incomplete, to be completed

**Right of erasure (right to be forgotten)** – you can ask that data is deleted and no longer processed if it is no longer necessary to do so

**Right to restriction on processing** – you can ask that data is not processed

**Right to data portability** – you can request a portable version of your personal data

**Right to withdraw consent** – if you have consented to provide personal data – then you can withdraw that consent.

Please note that some of the rights mentioned above are only available to you in certain circumstances and may have limitations. For more information, please visit the Information Commissioner's Office website <https://www.ico.org.uk>

## 10. Changes to the Privacy Policy

This Privacy Policy may change over time. If there are any significant changes then you will be contacted to inform. No changes to this policy will be made which will adversely affect your rights as a data subject.

## 11. Contact Details

If you have any questions about your personal data, or this Privacy Policy, please contact:

Data Protection Officer  
[dataprotection@londonlegacy.co.uk](mailto:dataprotection@londonlegacy.co.uk)

London Legacy Development Corporation  
Level 10  
1 Stratford Place  
Montfichet Road  
London  
E20 1EJ

## **ANNEX ONE – Guidance Issued by the Premier League – 17 June 2020**

### **DATA PROTECTION NOTICE**

In order for you to gain access to the stadium on match day, it will be necessary for your completed medical questionnaire as to symptoms and travel status (as required under paragraph 8(ii) of the Premier League's Match Day Protocol) and your personal data within or associated with that (your "Questionnaire Data") to be provided to and processed by LS185 in line with its COVID-19 Stadium Operations Policy.

Failure to provide this data will prevent your access to the stadium on match day. LS185 will process your Questionnaire Data as a data controller in accordance with Data Protection Law and its own policies and procedures. The lawful basis of this processing is that it is necessary for LS185 and the Club's compliance with its legal obligations and/or legitimate interests in operating its stadium in a safe and lawful manner and it is also necessary for your Questionnaire Data, which is data about your health, to be processed so LS185 can comply with its obligation to provide a safe working environment and fulfil its duty of care towards those working at its stadium.

The Premier League will not have access to your Questionnaire Data except where necessary for the purposes of competition integrity as data controller in accordance with Data Protection Law and the Premier League policy available on its website.

No other sharing of your personal data will be permitted and your personal data will only be used for as long as it is necessary for the purposes set out above but will be deleted once the COVID-19 protocols are no longer needed, unless otherwise communicated to you by LS185 and/or required by law.

It is not necessary for you to provide your consent to this use of your personal data but you do have legal rights in relation to it. For more information on your rights (as to access, rectification, erasure, restriction of processing, objection to processing, profiling and automated decisions, if applicable, portability and complaints) in respect of your personal data please contact [dataprotection@londonlegacy.co.uk](mailto:dataprotection@londonlegacy.co.uk)

Data Protection Law is the General Data Protection Regulation 2016/679 and the Data Protection Act 2018