

Privacy Notice – SafeZone

The University is committed to looking after any information that you make available to us. We aim to be clear about what we will do with your data. This privacy notice explains when and why we collect personal information about you and how we will use this information including the ways we might share this with others. It also explains how we keep your information secure as well as the rights you have in relation to the information we hold about you.

The headings below set out the main information we need to give to you.

The privacy notice will be regularly reviewed to make sure it contains the most up-to-date information. We will let you know if we make significant changes to this privacy notice.

If you have any questions about any of the information contained in this privacy notice then you can contact us on dataprotection@uws.ac.uk

Who are we?

The University of the West of Scotland (referred to in this Privacy Notice as the “University”, “we”, “our” or “us”) is the Data Controller under the data protection legislation. This privacy Notice sets out how we process the personal data we collect about you (referred to in this Privacy Notice as “you” or “your”).

What type of information do we collect about you?

If you choose to download the app it will collect the following information about you:-

- Your name,
- Your staff or student e-mail address, and
- Your location when on any University campus.

When you download the app this will be set to automatically check you in when you move around the University campus. However, you can switch off this functionality at any time so that the system will only log your location when you manually check in to each location. You can also switch off the app at any time. You can find out further details about how to do this [here](#).

What are the sources of the information we hold about you?

The only information we collect will be the information you have provided when you download the app and any location information made available by your use of the app on campus. As mentioned above you are able to switch off the app at any time using the instructions [here](#).

We will not collect any information from third parties for use with the Safezone app.

How will we use your information?

We will use the information we hold about you to support our efforts against the spread of COVID-19. If a member of the University community informs us they have had COVID-19 and have been on campus while contagious, the app would show us what areas of our campus they have been on. This allows informed decisions to be made relating to any

additional cleaning that may need to be undertaken. The information may also be shared with Public Health/Test & Protect if they ask us to do so to inform their response to any potential outbreak.

Similarly, should the app be used to report a security or health emergency issue, the data will be used to inform the response to the situation, by identifying the caller's location on campus. This will allow support to attend as quickly and directly as possible.

Why do we need to process your personal data?

Downloading the app is voluntary. There will be no adverse consequences if you choose not to install it and we will not prevent you from coming on to campus. We will process the information you provide to us on the basis of your consent when you download the app and agree to the End User Licence Agreement that is presented to you.

In addition, there will be times when we will process the information you provide because we have a legitimate interest in doing so. In particular, collecting and processing the data is in the interests of the University, and our staff, students and visitors. It is also in the wider public interest as part of the public health efforts to tackle COVID-19.

How long will we keep your information for?

We will only keep the information we hold about you for 21 days after it is collected. Once the 21 days has expired the system is set up to automatically delete the information. This retention period is in line with the current government guidance.

Who has access to your information and who will we share your information with?

The information you submit to us will only be accessed by a limited number of University staff who need to use this to co-ordinate our Covid response or to respond to security or health emergency issues. As noted above we may, if requested, share the information you have provided to us with public health authorities as part of the Test and Protect scheme.

We will always make sure that when we share information about you that we do this in line with the legislation and that we only share the minimum amount of information that is needed.

SafeZone is a third-party app that has been developed by CriticalArc. When you register for the app, you will be required to accept the [CriticalArc Privacy Policy](#) and End User Licence Agreement. These give you further information about what CriticalArc will do with the information you provide. The University will act as the Data Controller for the information you provide and we have an agreement in place with CriticalArc to make sure that they process your data in line with our instructions and with the data protection legislation.

What choices do you have in relation to your information?

Under the legislation you have certain rights in relation to the information we hold about you:

- To obtain access to, and copies of personal data we hold about you;
- To require us to stop processing your personal data if the processing is causing you damage or distress;
- To require us to stop sending you marketing communications;

- To require us to correct any personal data we hold about you that is incorrect;
- To require us to erase your personal data;
- To require us to restrict our data processing activities;
- To withdraw your consent to our data processing activities (without affecting the lawfulness of our processing before you withdrew your consent);
- To receive the personal data that we hold about you, in a reasonable format specified by you, including for the purpose of you transmitting that personal data to another controller;
- To object, on grounds relating to your particular situation, to any of our particular processing activities where you feel this has a disproportionate impact on your rights.

Many of the rights above are not absolute so there may be times when you make a request to us and we are unable to meet it in full but if this is the case we will explain to you fully why we have not been able to do what you have asked.

More detailed information about the rights you have any how you can make a request can be found at <https://www.uws.ac.uk/about-uws/compliance/information-records-management/data-protection/>

How can you access and update your information?

We want to make sure that the information we hold about you is always accurate and up-to-date. The app lets you update your own personal details if you need to do so. If you are unsure how to do this you can contact dataprotection@uws.ac.uk and we will help you.

How will we keep your information safe?

As mentioned above Safezone is a third party app developed by CriticalArc. You can find out more about how your information is kept safe by them in their Privacy Notice.

When the University is using the information you provide this will be stored on Microsoft servers. The University has assessed this to make sure that Microsoft offered an appropriate level of security taking into account the nature of the information that is provided to us.

You can find out further information about these security measures at the following websites:-

<https://www.microsoft.com/en-gb/trust-center/privacy/data-location>

<https://privacy.microsoft.com/en-gb/privacystatement>

<https://docs.microsoft.com/en-us/microsoft-365/compliance/gdpr?view=o365-worldwide>

In addition the University will make sure that any staff who are accessing the information you have provided have received appropriate training about their data protection obligations and their duty to keep the information about you safe.

Will we transfer your information outside of the EEA?

The information you provide will only be transferred out of the EEA in anonymised form. The only exception to this is if you contact the CriticalArc support desk, in which case you may be directed to one of their support desks based in a non-EEA location.

Who is the University's Data Protection Officer?

The Head of Legal Services is the UWS Data Protection Officer. If you have any concerns about how we handle your personal data then you can contact the Data Protection Officer directly by e-mail dataprotection@uws.ac.uk or by post at Data Protection Officer, University of the West of Scotland, Legal Services, High Street, Paisley, PA1 2BE

How can I complain about your use of my information?

If you remain unhappy then you have a right to complain to the Information Commissioners Office:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
e-mail:casework@ico.org.uk and telephone 0303 123 1113