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# COVID-19 Emergency Response Privacy Notice

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## 1. Introduction

This Privacy Notice is in addition to your main applicable Privacy Notice. It applies to current employees, workers, agency workers, consultants, interns, visitors, partners and directors

It is in response to the COVID-19 epidemic and lays out new processes that have been introduced to address the Government measure to combat the spread of the disease, provide support to our customers, protect our workforce and ensure the long-term interests of the Company.

Marshall ADG is the “data controller” for the purposes of data protection law. This means that we are responsible for deciding how we hold and use personal information. We are required by law to notify you of the information contained in this Emergency Privacy Notice.

This privacy notice will remain in force for the duration of the COVID-19 pandemic.

It is important that you retain and read this document.

We may update this document at any time and the latest version will always be available on the [Company Internet](#), but we will send you a new Emergency Response Privacy Notice if any significant changes are made.

## 2. Responsibilities

- 2.1 The Group Data Privacy Manager is responsible for ensuring that this notice is made available to data subjects.
- 2.2 All Employees/Staff of Marshall ADG who interact with data subjects are responsible for ensuring that this notice is drawn to the data subject’s attention.

# COVID-19 Emergency Response Privacy Notice



## 3. Privacy Notice

### 3.1 We are

Marshall Aerospace and Defence Group. Please refer to your main privacy notice for full details of companies covered by this title.

### 3.2 Types of Personal Data:

Is any data that could identify a living individual. Please refer to your main Privacy Notice for full details of definitions

### 3.3 We will process the following personal data about you:

#### **If you are working for Marshall**

##### **Ordinary Data**

- Your name, Clock No., Cost Centre, whether you are absent from the business e.g. Paternity or Maternity leave, working both on site and from home on a regular basis, working both on site and from home on an ad-hoc basis, working solely on site, wholly working from home

##### **Special category personal data**

- Self isolating because you are displaying symptoms of COVID-19, but have no ability to work from home.
- Self isolating because somebody in your household is displaying symptoms of COVID-19, but no ability to work from home
- Whether or not you fall into a Government classified vulnerability Group or are at risk for some other reason. Those being
  - Group A - individuals defined by the Government as extremely vulnerable to COVID-19
  - Group B - individuals defined by the Government guidelines as vulnerable
  - Group C - Individuals living in the same household as someone in Group A
  - Group D - Individuals with no underlying health issues but significant wellbeing concerns (self or family)
  - Group N - Individuals with no specific additional vulnerability to Covid-19 i.e. Vulnerability – Normal
- Your COVID-19 Health Status. These categories being;
  - COVID-19 Confirmed
  - COVID-19 Suspected
  - Self-Isolating Household – Because a member of your household is displaying symptoms
  - Self Isolating Self – Because you are displaying symptoms
  - Well – default status in the absence of any other information.

# COVID-19 Emergency Response Privacy Notice



## **If you attend a Marshall site**

### **Ordinary personal data**

- Your name, Clock No (or other identifier), date & time that a body temperature test was taken and your line manager or Marshall employee responsible for your attendance on site.

### **Special category personal data**

- Body temperature

We will only record this information if a body temperature above or equal to 37.8°C is registered and will only record that it has exceeded 37.8°C (not the exact reading).

## 3.4 **The personal data we collect will be used for the following purposes:**

### **If you are working for Marshall**

Marshall ADG will maintain a dashboard to enable the monitoring of their labour resource during the COVID-19 Government restrictions on working practices.

- Our key objective is to ensure business continuity while prioritising the health and safety of our team and the continued support for our customers and other people.
- In doing so, we will adhere to government guidelines and legislation on health and safety for our colleagues, our customers, and suppliers, while focusing on essential business activities only until such time we can return to normal operations
- Purpose of the dashboard:
  - Monitor the health of our employees and reduce risk for our people on site and at home
  - Tool for resource and cost planning for short and medium term essential business requirement and contract delivery
  - Live updates and visibility across the business of the health, location, and availability of employees
  - Long term planning: essential resource requirement and actions based on outlook longer term

This processing is necessary for reasons of substantial public interest in the area of public health

### **If you attend a Marshall site**

This processing is necessary for reasons of substantial public interest in the area of public health

To protect the VITAL INTERESTS of all people that have a need to attend a Marshall

designated site (and the people that they come into contact with). If a person entering the site registers a temperature equal to or in excess of 37.8°C they will be asked to return home and advised to follow Government guidelines to self isolate.

### 3.5 Disclosures, Transfer & Storage

#### **If you are working for Marshall**

The information relating to your vulnerability category, work status and health status will be stored on a secure central location and access to it will be strictly limited to the Executive and a restricted number of direct reports (limited to a need to know basis).

The information will not be transferred or disclosed to any other organisation

#### **If you attend a Marshall site**

##### If you are a Marshall employee or contracted to work in the Aerospace part of the business

The information will be recorded in HR.Net, and will have the same rights applied to it as any other HR Profile record entry. It will not be transferred or disclosed to any other organisation unless, there is an overriding legal reasons for it to be so.

##### If you are a non-Marshall employee or contractor

The information will be stored on a secure central location, with access to data strictly limited to those that have a need to know. It will not be transferred or disclosed to any other organisation, unless there is an overriding legal reasons for it to be so.

### 3.6 Retention period

We will hold your personal data ONLY for the duration of the COVID-19 Emergency unless there is another overriding legal reason to retain it.

### 3.7 Your rights as a data subject

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to ask for data that we hold about you that is inaccurate or incomplete to be corrected.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records. If there is no overriding legal reason to keep it.
- Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- Right to object – you have the right to object to certain types of processing
- Right to object to automated processing, including profiling – You have the right to ask for certain important computer-made decisions (including profiling) to be challenged and to ask for a human to intervene.

(Please note that at this time no automated processing of Personal Identifiable Information (PII) is in operation.

- in the event that Marshall ADG refuses your request under rights of access, we will provide you with a reason as to why.
- Where the legal basis for the processing of PII data is 'consent', you have the right to withdraw that consent at any time and the record will be deleted where there is no overriding legal basis to keep it.

Please note that it is the company's policy not to use consent for the legal basis for process except in exception cases with the express approval of the Data Privacy Manager

You have the right to complain as outlined in clause 3.10 below.

If you would like to exercise any of these rights, please contact the company Data Privacy Manager, by emailing [DataPrivacyManager@MarshallADG.com](mailto:DataPrivacyManager@MarshallADG.com) or by sending written correspondence to The Data Privacy Manager, Marshall ADG, Airport House, Newmarket Rd, Cambridge, CB5 8RX.

You can make a subject access request by completing the organisation's [Subject Access Request Form](#)

### 3.8 Complaints

In the event that you wish to make a complaint about how your personal data is being processed by Marshall ADG or how your complaint has been handled, you have the right to lodge a complaint directly with Marshall ADG's Data Privacy Manager, by emailing [DataPrivacyManager@MarshallADG.com](mailto:DataPrivacyManager@MarshallADG.com) or by sending written correspondence to The Data Privacy Manager, using the contact details below.

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## **COVID-19 Emergency Response Privacy Notice**

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If the complaint is not resolved to your satisfaction you have the right to lodge the complaint with the Supervisory Authority.

# COVID-19 Emergency Response Privacy Notice



The details for each of these contacts are:

	<b>Data Privacy Manager</b>	<b>Supervisory Authority</b>
Contact Name:	Isobel Aylott	Information Commissioners Office (ICO)
Address line:	Marshall ADG, Airport House, Newmarket Rd, Cambridge, CB5 8RX	Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF
Email:	DataPrivacyManager@MarshallADG.com	<a href="https://ico.org.uk/global/contact-us/email/">https://ico.org.uk/global/contact-us/email/</a>
Telephone:	01223 373206	03031231113
Website		<a href="https://ico.org.uk/concerns/">https://ico.org.uk/concerns/</a>

The recommended method of communication to the ICO is via their website

## Document Owner and Approval

The Data Privacy Manager is the owner of this document and is responsible for ensuring that this record is reviewed in line with the review requirements of the GDPR.

A current version of this document is available to all members of staff on the [Company Internet](#)

## Change History Record

Issue	Description of Change	Approval	Date of Issue
1.0	Creation of Privacy Notice	Data Privacy Manager	02/04/2020
2.0	Incorporation of Dashboard to monitor the health of our employees, and enable resource planning during the COVID-19 emergency	Data Privacy Manager	06/04/2020

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