

# PRIVACY NOTICE

## RE: SCOTTISH EVENT CAMPUS'S USE OF THE NHS SCOTLAND COVID CHECK APP



### How the COVID Check App uses your data and what your rights are:

#### What is the purpose of the COVID Check App?

The purpose of the COVID Check App is to allow the operator of the device onto which the COVID Check App is downloaded to scan and read a QR code produced by a trusted authority (including, but not limited to, NHS Scotland). The QR code contains information associated with an individual's COVID status. This QR code confirms that the individual has been fully vaccinated against COVID-19 or has met negative testing or exemption requirements, to verify that individual's COVID status, for the purposes of international travel, or for domestic purposes as set out in Health Protection (Coronavirus) (Regulations) (Scotland) Regulations 2021.

The COVID Check App is designed for use in scanning and verifying COVID status QR codes and must not be used for any other purpose.

This privacy notice applies to the COVID Check App only.  
How does the COVID Check App work?

The scanning device for the QR code is known as the COVID Check App and is downloaded to a mobile device from the Apple App Store or Google Play Store, in order to verify bar-codes presented either in digital or paper format by members of the public.

The operator of the COVID Check App views the information contained in the QR code by using the camera on their device. Once the QR code is successfully scanned, details of an individual's COVID vaccination status are displayed within the COVID Check App to the operator. The operator uses this information to determine the individual's eligibility for entry to the venue or event based on Scottish Government guidance.

#### What information is recorded in the COVID Check App?

The COVID Check App scans and verifies the QR code presented to the operator. The personal data is displayed within the app to the operator. However, at no point during the scanning process is personal or health data stored or retained on the scanning device and transferred to another location or device.

Metrics on the usage of the COVID Check App are captured. These are anonymous and cannot be used to identify an individual or the operator. The metrics are sent to Microsoft App Centre for analysis. Using this data can make useful observations such as error frequencies, request frequencies, service usage and oversight of the general activity.

#### The metrics collected are:

- Active Users
- Daily sessions per user
- Session duration
- Device type
- Country the user is in
- Language used
- App version per user
- Public key used.

#### How your Personal Data is used

When the QR code is scanned, the operator will be able to see personal data about you including your name, date of birth, and personal data that confirms that you have been fully vaccinated against COVID-19 or, in some cases, that you have recently tested negative or have recovered from Covid-19, to verify your COVID status for the purposes of international travel, or for domestic purposes as set out in Health Protection (Coronavirus) (Regulations) (Scotland) Regulations 2021.

Your personal data is only used to verify your COVID status, and no personal data is collected or stored by the COVID Check App.

#### Personal data

The personal data contained in the QR code and used by the COVID Check App are:

- your name
  - your date of birth
- Special category (health) data

The special category personal data contained in the QR code and used by the COVID Check App are:

- your dates of vaccination
- what vaccine you received
- last test result
- recovery data i.e. data that represents an individual who has recovered from COVID-19. This data is based on your test results where applicable.

### How will my information be shared?

No onward sharing is possible from the COVID Check App.

#### The lawful basis for processing your personal data

Under data protection law, Venue operators scanning your QR code have a lawful basis that allow them to process personal information. In this case, the lawful basis for processing your data is:

- UK GDPR 6(1)(c) – necessary for compliance with a legal obligation; and
- UK GDPR 9(2)(i) – Public Health (with a basis in law)

No personal data is collected or stored by the COVID Check App.

This privacy notice has been drafted in line with UK GDPR.

Guidance on UK GDPR is available from the ICO web site.

How long is your personal data kept for?

Personal data is not retained on the COVID Check App.

#### Personal data storage

Personal data is not retained on the COVID Check App.

#### Your rights as a data subject

As defined in data protection law, UK GDPR Article(s) 12-23, you have several rights including the right to be informed about the use of your personal data, as outlined in this privacy notice.

As no personal data is collected or stored, some rights may not be applicable such as the right to access the information held about you and the right to request rectification of any inaccurate personal data held.

You do have the right to object to the processing of your data by deciding not to allow the operator of the COVID Check App to scan your COVID Status QR code. Refusing to permit the operator of the COVID Check App to scan your QR code may lead to you being denied access to a service that requires verification of your COVID status.

For further information about your rights, please refer to [www.ico.org.uk](http://www.ico.org.uk)

You can also read more about data protection on the Information Commissioner's Office website ([www.ico.org.uk](http://www.ico.org.uk)).

#### Data controller

Should you have any questions about the data processing, please contact the SEC's Data Protection Officer in writing or email:

Address: Data Protection Officer, SEC, Finneston Way, Glasgow, G3 8YW.  
By Email: [dataprotectionofficer@sec.co.uk](mailto:dataprotectionofficer@sec.co.uk)

#### Formal complaint about the processing

If, after contacting the person as above, you wish to make a formal complaint about the processing of your personal data, please contact the Information Commissioner at:

Information Commissioner's Office (ICO)  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Telephone: 0303 123 1113

Email: [casework@ico.org.uk](mailto:casework@ico.org.uk)

Visit the ICO website ([www.ico.org.uk](http://www.ico.org.uk)).