

TRAX

Privacy Notice

Codentia Limited and its entities are committed to protecting the privacy and security of your personal information.

This privacy notice describes how we collect and use personal information about you during and after your relationship with us, in accordance with the Data Protection (Jersey) Law 2018 (DPJL) and the General Data Protection Regulation (GDPR). We are registered with the Jersey Office of the Information Commissioner, registration number 66799.

Codentia Limited is a "data controller" and this Privacy Notice is specific to one of its entities, known as 'TRAX'. This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

The DPJL and GDPR says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

The Kind of Information We Hold About You

TRAX collects data about you when you use the QR code and complete the required fields you are presented with on your mobile device. The data TRAX will collect can vary depending on the service being used.

For the COVID-19 Contact and Trace scheme TRAX will collect:

- First name
- Surname

- Telephone number
- Email address (optional)

For the Visitor log service TRAX will collect:

- First name
- Surname
- Telephone number
- Email address (optional)
- Your organisation
- Whom Visiting
- Vehicle registration

Organisations using the TRAX service can also add additional fields asking for data relevant to them. We advise you to visit that organisations Privacy Notice and ascertain their purpose for collection

How Is Your Personal Information Collected?

We collect personal information when you interact with one of the QR codes provided to an organisation or venue. This QR code is unique to the user's location and will collect the data you provide. TRAX does not collect personal data without your explicit consent.

How Will We Use the Information About You?

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

1. When we need to share your information with the relevant authorities, e.g. Government contact tracing team, as part of a positive COVID-19 case investigation.
2. When the TRAX account holder requests the information from our data base.
3. Where we need to comply with a legal obligation.
4. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

We may also use your personal information in the following situations, which are likely to be rare:

1. Where you have given you consent to contact you for a specific purpose, e.g. direct marketing.

Legal Basis for collecting personal information

We will only use your personal information when we have a legal basis to do so. The main Lawful bases we rely on includes consent (where you have given permission), contract (where processing is necessary for the administration of your account) and our “legitimate interests” (where processing is in the interest of our company and we believe you would have a reasonable expectation for us to do this).

Data Sharing

The specific purpose of TRAX is to provide a digital solution to venues and individuals to provide their information required as part of the COVID-19 contract tracing system or a visitor log to an office, construction site or function. We are providing a safe and secure way for the data to be collected, stored, shared when required and disposed of after the required retention period.

We will only share your data in the following circumstances:

1. To provide information to the relevant authorities, e.g. Governments contact tracing team if the premises you attended forms part of a positive COVID-19 case investigation.
2. To provide the account holder details of attendance at their venue, building or site.
3. To fulfil our legal obligations if a formal law enforcement or Health and Safety Inspectorate request is received.

Data Storage

The personal data that we collect from will not be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). We use a cloud service with data storage centres in London who have specific instruction from us to only store your data at that location.

Data Security

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. We encrypt all data sent to us when transferring to our storage locations and at rest at that location. Data Provided to any Public

Authority or requesting organisation is provided in an encrypted state or a password protected document.

In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality. Details of these measures may be obtained from our data protection lead, please contact data@trax.ie.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Data Retention

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

The latest guidelines from Government is to retain your data collected as part of a Track and Trace scheme for a maximum of 21 days, after which your data will be securely disposed of.

Data collected when using our visitor log service will be retained for a period of 10 years. If you would like a copy of our complete retention schedule please contact Data@Trax.ie.

Rights of Access, Correction, Erasure, and Restriction

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your relationship with us.

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete

or remove your personal information where you have exercised your right to object to processing (see below).

- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

If you want to correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact data@trax.ie.

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

We will respond to your request within **4 weeks** of verifying your identity.

Right to Withdraw Consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact data@trax.ie. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Data Protection Manager

We have appointed a Data Privacy Manager to oversee compliance with this privacy notice and all other matter relating to our compliance with the data protection laws. If you have any questions about this privacy notice or how we handle your personal information, please contact the Data Privacy Manager. You have the right to make a complaint at any time to the relevant Information Commissioner, the supervisory authority for data protection issues.

Complaints

We'd like the chance to resolve any complaints you have; however, you also have the right to complain to the Jersey Office of the Information Commissioner about how we have used your personal data.

The details for each of these contacts are:

Codentia Limited, attention of the CEO

Office 7, 1st Floor, Forum 4, Grenville Street, St Helier JE2 4UF

Telephone +44 (0) 1534 748620 or data@trax.je