

DATA PROTECTION – PRIVACY NOTICE ADDENDUM

PROCESSING OF PERSONAL DATA – COVID 19

Following the outbreak of COVID-19 and its development into a global pandemic, businesses have been implementing exceptional measures to safeguard employees, customers and others against the health threat that is being posed.

In an effort to manage the impact of the COVID-19 outbreak, and to ensure that the decisions being taken are fully informed, Carter Jonas may be collecting information from Partners, staff, Consultants and visitors that would not typically be collected. For example, we may collect information such as whether individuals have self-isolated or have been diagnosed as having the virus or have been in contact with anyone who has. Much of this information would be regarded as special category data under GDPR.

We may be required to disclose information relating to COVID 19 within the Firm, or externally (subject to applicable law), in order to meet our obligations to ensure the health and safety of our Partners, staff and their families as well as helping to protect the wider public. Disclosure of such information will be limited as much as possible and where practical will not include the names of individuals. This information will only be shared to enable others to take appropriate protective steps or where we are required to make such a disclosure by Law and the individuals concerned will be advised in advance of the intended disclosure. This disclosure is permissible under Article 9 of the GDPR.

With effect from August 2020, we have also introduced a “track and trace” system to enable us to record the contact information for visitors to our Offices. This information will only be used in the event an individual who has recently attended the premises is known to have tested positive for Covid 19 in which case we will endeavour to trace those who have been in close contact with the infected person for a long enough period of time to be at risk of infection. This measure is our contribution to public health measure designed to interrupt the spread of coronavirus in the community. The information collected will be treated in the strictest confidence and will only be used for the purpose stated; the data will be retained for no more than 6 months from the date of collection.

This privacy notice should be read in conjunction with the Carter Jonas Privacy Policy which can be found on the Carter Jonas website. Partners, staff and retained consultants should refer to the HR Privacy Notice which can be found on the Loop.

Concerns regarding the processing of personal data may be directed to the Data Protection Officer by emailing joanne.dick@carterjonas.co.uk

March 2020

Updated August 2020