

DHG Belfast Limited trading as Clayton Hotel Belfast
Covid 19 Privacy Notice

About this Addendum

This Covid-19 Privacy Notice (this Notice) is in response to the Covid-19 pandemic and serves as an addendum to the Clayton Hotel Belfast Privacy Policy available on our website. This Notice should be read in conjunction with the Clayton Hotel Belfast Privacy Notice.

Clayton Hotel Belfast may seek to collect and process personal data which is above and beyond what would ordinarily be collected from you. This is done to ensure the safety and the well-being of our customers, employees, agents, contractors and representatives. This data may include health data which is considered “sensitive” or “special category of personal data” under the UK General Data Protection Regulation (GDPR).

Clayton Hotel Belfast will always treat the personal information entrusted to it, in particular sensitive or special category personal data, with the highest standards of care and in line with all applicable legal requirements, regulations and guidelines from relevant Governments, Agencies, International Organisations and Public Authorities.

Clayton Hotel Belfast will comply with the GDPR, the Data Protection Act 2018 and all amendments, any other legislation relating to personal data and all other local or national legislation and regulatory requirements in force from time to time which apply to us relating to the use of your personal data.

What personal data do we process and why?

We collect the following personal data for the purposes of this Addendum:

- Information relating to your vaccination status via the Public Health Agency (PHA) COVIDCert Check NI ‘Verifier app’ before giving you access to our services/premises. No personal data relating to your vaccination status is collected or stored by Clayton Hotel Belfast.
- Your name, contact details, date, time and location of your presence in Clayton Hotel Belfast for the PHA Contact Tracing service.

Please note that if you do not provide us with the personal data listed above, we may not be able to allow you to enter Clayton Hotel Belfast.

What are our legal grounds to collect and process your personal data?

We rely on the following legal bases to collect and process your personal data:

- Legal obligation: the processing is necessary to comply with the law.
- Public task: the processing is necessary to perform a task in the public interest, and the task has a clear basis in law.

Purpose for processing personal data:

The personal data collected about you will be used for the following purposes:

- To verify your Covid vaccination Status. It will be used by Clayton Hotel Belfast, where the Northern Ireland Executive has decided that it is in the public interest to permit only those persons who possess evidence of, being fully vaccinated against COVID-19 to be present on our premises to minimise as far as possible the risk of transmission of the virus which causes COVID-19.
- To maintain appropriate records of your interactions for contact tracing purposes.

Who are we sharing your personal data with?

Your data may be shared with public authorities, in particular health authorities, if we have a legal obligation to do so.

How long do we keep your data for?

We will endeavour to record your personal data, especially your health data, only for the time strictly necessary for the purposes set out in this privacy notice. This includes the following periods:

- 28 days to one month after your visit to our premises, unless a longer period is required by law.

- For as long as necessary to comply with our legal obligations, contractual requirements or the establishment, exercise or defence of legal claims.

We will delete/destroy your personal data immediately after the relevant retention period above is reached.

How do we protect your data?

The information you share with us under the scope of this Notice will be secured by additional technical and organisational measures and only staff required to see this information will be able to access it.

Changes to this Notice

This Notice will be kept under regular review and any updates will be placed on Clayton Hotel Belfast's website.

You can access the PHA COVIDCert Check NI 'Verifier app' Privacy Policy [here](#) and the PHA Covid-19 Contact Tracing Programme Privacy Policy [here](#). We are not responsible for the content or privacy practices of these websites.