

GRIPPLE LIMITED COVID-19 TRACK AND TRACE PRIVACY NOTICE

1. What is the purpose of this document?

GRIPPLE LIMITED is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. This privacy notice describes how we collect and use personal information about you when you visit our premises for the purposes of Track and Trace introduced in response to the COVID-19 virus, and how long it will usually be retained for. It provides you with certain information that must be provided under the General Data Protection Regulation ((EU) 2016/679) (GDPR).

2. Data controller

Gripple Limited is the data controller of your personal information.

3. Data processor

Gripple Limited is using an evePASS QR code operated by Eve.io DE GmbH to collect your personal data on its behalf and Eve.io DE GmbH is acting as a data processor.

4. What personal data we collect

The details we will collect from you via both the Track & Trace form and the evePASS app are:

- first and last name
- the company you work for (where applicable)
- mobile phone number
- email address
- time of entry to and departure from our premises

5. Purposes your data will be used for and who we will share the data with

COVID-19 is an infectious disease affecting the whole of the country. The virus that causes COVID-19 is a coronavirus. Infectious diseases present a serious and ongoing threat to public health. If not controlled, they can infect large numbers of people and, depending on the disease and other factors, can result in ill-effects ranging from relatively minor symptoms to early death.

We will use your data to contact you if we believe you may have been in contact with someone during your visit who has contracted COVID-19.

Contact tracing is an important way of controlling the spread of infectious diseases. It involves identifying and tracing all the people who have been in contact with a person who has been infected. Depending on the nature and duration of your contact with an infectious person, you may require advice or treatment to prevent the disease from spreading further.

6. Legal basis

Gripple Limited's legal basis for processing your personal data is it's in the legitimate interests of you, Gripple Limited and public health efforts to tackle Covid-19 to process your personal data.

7. Your rights

By law, you have the following rights as a data subject:

- your right to get copies of your information – you have the right to ask for a copy of any information about you that is used
- your right to get your information corrected – you have the right to ask for any information held about you that you think is inaccurate to be corrected
- your right to limit how your information is used – you have the right to ask for any of the information held about you to be restricted, for example, if you think inaccurate information is being used
- your right to object to your information being used – you can ask for any information held about you to not be used. However, this is not an absolute right and we may need to continue using your information. We will tell you if this is the case
- your right to get information deleted – this is not an absolute right and we may need to continue to use your information. We will tell you if this is the case
- your right to withdraw consent (if applicable). However we may continue to process your data if we have another legal basis to do so.

If you're unhappy or wish to complain about how your personal data is used, you should contact the People & Culture Team in the first instance to resolve your issue. If you're still not satisfied, you can complain to the [Information Commissioner's Office](#).

8. Retention and storage of your data

Your data obtained via the evePass QR code will be stored securely in the EU on the evePASS app which is operated by Eve.io DE GmbH. Details of the Eve Privacy Notice can be found here <https://help.eve.io/en/articles/1656985-privacy-policy>.

Your data will be automatically deleted within 30 days.

Your data obtained via the Track & Trace form will be stored securely by Gripple Limited in the UK for 30 days and will then be disposed of in a safe and secure manner.

9. Data protection manager

If you have any questions about this privacy notice or how we handle your personal information, please contact dataprotection@gripple.com.

10. Changes to this privacy notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.