



UNIVERSITY  
OF LONDON

# Halls Tenant Privacy Notice

for managing infectious diseases  
(including COVID-19)

## Intercollegiate Halls

[london.ac.uk](https://london.ac.uk)

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The University of London Intercollegiate Halls of Residence, as part of its duty of care, must collect, store and manage the data of its tenants in relation to infectious diseases, including COVID-19. This should be read in conjunction with the overall Halls Tenant Privacy Notice.

## What data is the University collecting and for what purpose?

**The University keeps a number of check boxes on its accommodation system which covers the following in regard to each tenant:**

- Currently in self-isolation
- Dietary requirements for meal deliveries
- Start date of self-isolation

This data is used to generate printed lists for the security, catering and Resident Advisor teams in order to make sure everyone gets the support and services they need according to their circumstances.

### **Information collected via the Self-isolation Support Line**

- Name
- Hall
- Room number
- Phone number
- Email address

This is used in order to:

- Monitor case frequency in the halls population and report anonymised figures to the executive team
- Update all residents of current case numbers in their hall (anonymised) in our weekly update email
- Administer contact tracing within halls if and when this is required by law or by local public health authorities
- Inform system-wide infection prevention and control interventions (e.g., changes to catering, cleaning, event organisation)

## How do we ensure the collection of the data is lawful?

The University has to have a valid legal basis to process your personal data:

- We are processing the data to support our accommodation services under the circumstances of COVID-19 where it is necessary for the performance of your contract with us as a tenant
- The University may process your data where necessary for compliance with a legal obligation arising from Health and Safety Law
- Where we collect 'special category' health data, the University relies on its obligations relating to Health and Safety Law, reasons of substantial public interest for reasons of public interest in the area of public health
- If in a medical emergency where you cannot give consent and we need to provide your data to a doctor or other medical services, we will do this in regard to your vital interests or the vital interests of another person
- Where we are aggregating personal data relating to health and COVID-19 status to provide statistics for our own planning and decision making or to report to local or central government or health agencies, we do so for statistical purposes in the public interest

## Who do we share the data with?

The University may, under the legal bases specified above, share data with other organisations:

- Report to local authority public health teams (excluding name, room number, date of birth - but including age and general location within the building, e.g., wing and floor)
- Notifying your institution where registered to study that their student may need support
- Reporting to the Office for Students where required

The University may use an external contractor or 'data processor' to store or manage its data. The University contracts with StarRez to manage its tenant data. StarRez will process this data only for purposes specified by the University and will be bound by contract to meeting the University's obligations under the UK General Data Protection Regulation. The University also contracts with Pharos Response to operate our Self-Isolation Support Line. You can view the Pharos Response privacy policy at <https://pharos-response.co.uk/pharos-privacy-policy/>. The University will not share any information about you with Pharos Response. Pharos Response will have access only to data that you provide directly to them when you call the Self-isolation Support Line. Where data is passed outside the UK or EEA, the University will take the relevant steps to ensure there is adequate protection in place.

Your personal data will not be passed to any other third party without your consent, except where the University is required to do so by law.

## How long we keep your data for

The University can only retain your data as long as it is necessary for the purposes it was collected for. The University will continue to review its retention of COVID-19 data in the context of the public health situation and government guidance.

## Your rights

You have a number of rights under the General Data Protection Regulation, such as the right of access to your data (the 'Subject Access Right'). For more information, please see the University's Data Protection page at the following link:

<https://london.ac.uk/about-us/how-university-run/policies/data-protection-policy>

## Finding out more

You can find out more at the University's Data Protection page at the following link:

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