

Monday 29th June 14:00 - 15:30

GDPR GUIDANCE FOR THE HOSPITALITY INDUSTRY WHEN RECORDING CUSTOMERS DATA (AS PER COVID TEST & TRACE GUIDANCE)



<https://markgraceygdpr.co.uk>



MARK GRACEY GDPR

- Began working in the internet industry in the mid-90s when I joined Demon Internet to help set up their commercial web sales and support team
- Set up one of the UK's first network abuse teams (for Demon Internet) dealing with complaints and misuse of the internet
- 15+ year career in internet regulation dealing with everything from internet content liability to data protection and police liaison
- I've worked with the government on behalf of the internet industry and advised the House of Lords on internet policy matters as well as influencing the outcomes of a number of pieces of legislation
- In June 2017 set up the Digital Compliance Hub, now Mark Gracey GDPR, a subscription-based support service, offering a data protection and privacy compliance helpline (email and phone) backed up by a library of resources including guides, checklists, tools and templates as well as access to webinars and other compliance tools. We also offer outsourced DPO services and pay-as-you-go support.

RELEVANT EXPERIENCE

- Became a Data Protection Manager when the 1998 Act came into force, ensuring ongoing compliance as well as working with government and law enforcement with access to communications data and issues with data retention
- Computer Science Degree & Masters Degree in Computer and Communication Law

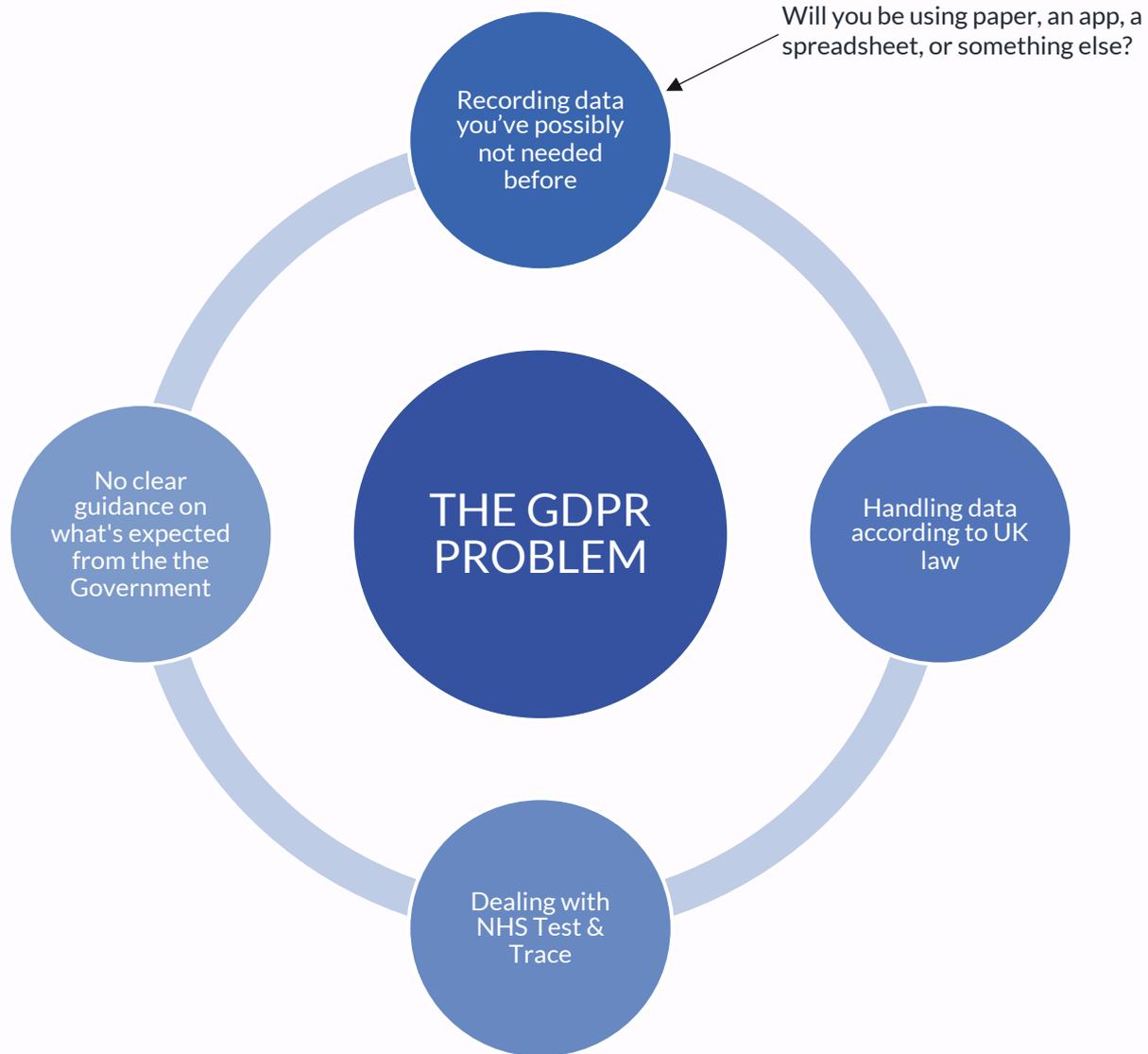
WHAT'S THE PROBLEM?



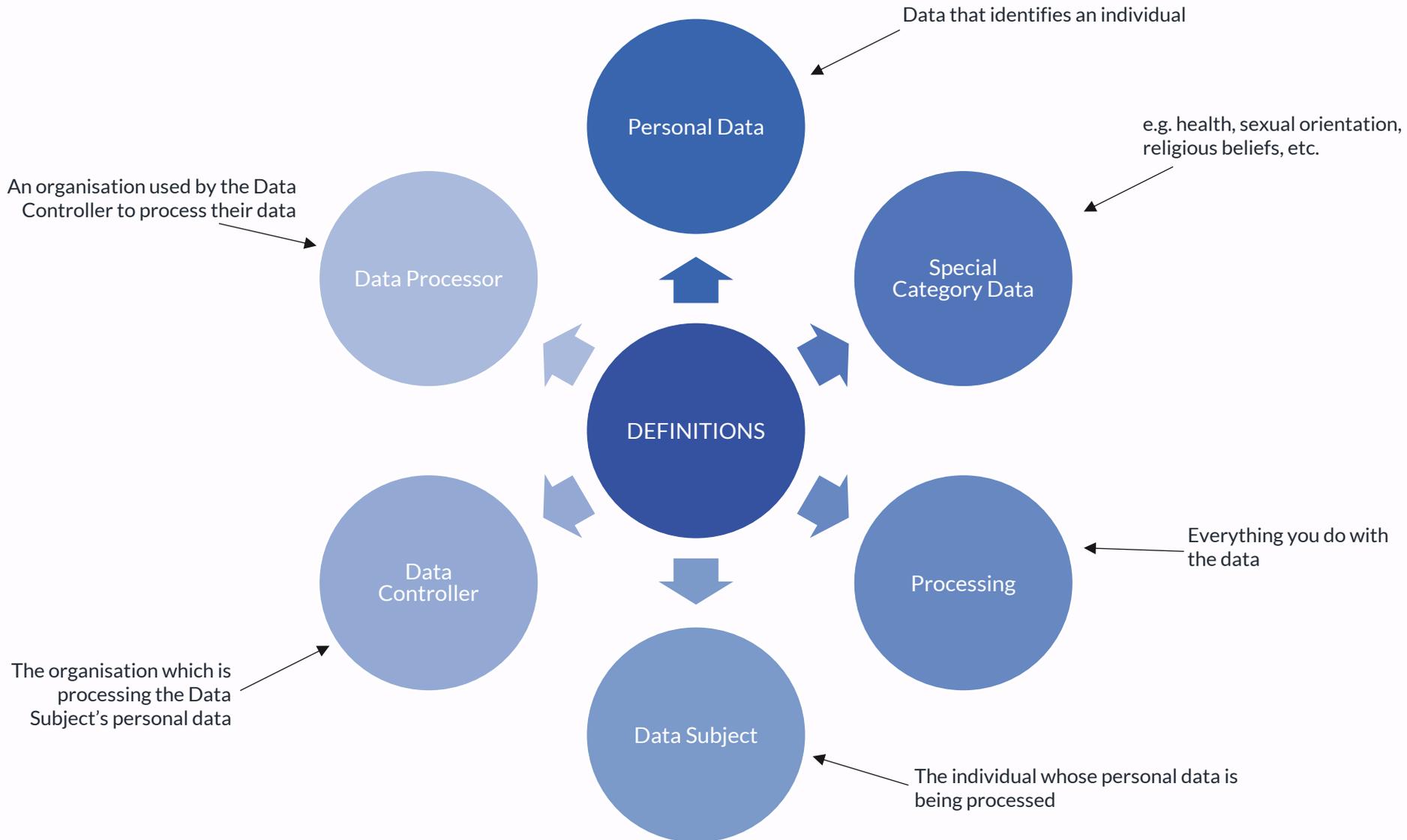
The opening up of the economy following the COVID-19 outbreak is being supported by NHS Test and Trace. You should assist this service by keeping a temporary record of your customers and visitors for 21 days, in a way that is manageable for your business, and assist NHS Test and Trace with requests for that data if needed. This could help contain clusters or outbreaks.

Many businesses that take bookings already have systems for recording their customers and visitors – including restaurants, hotels, and hair salons. If you do not already do this, you should do so to help fight the virus. We will work with industry and relevant bodies to design this system in line with data protection legislation, and set out details shortly.

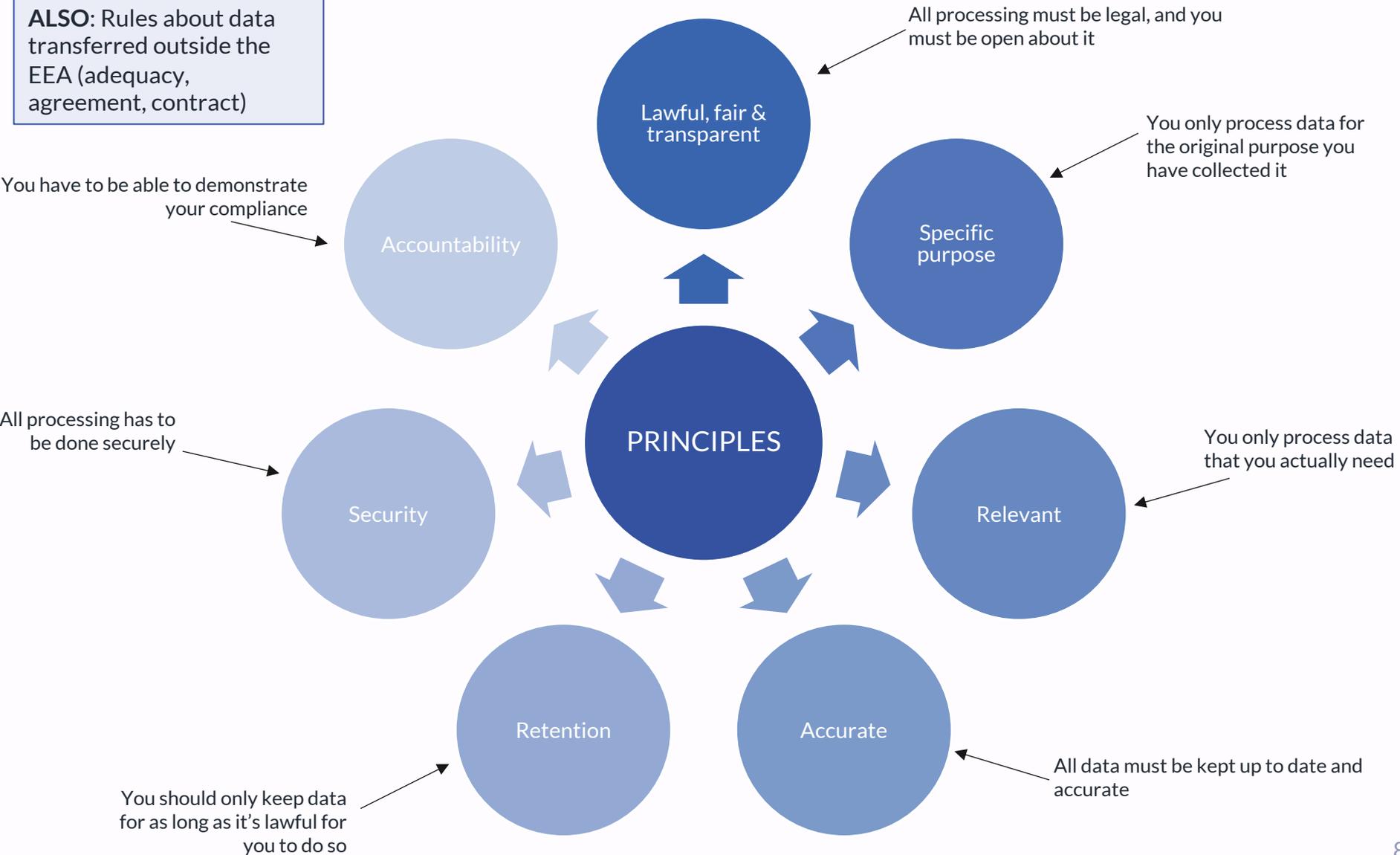




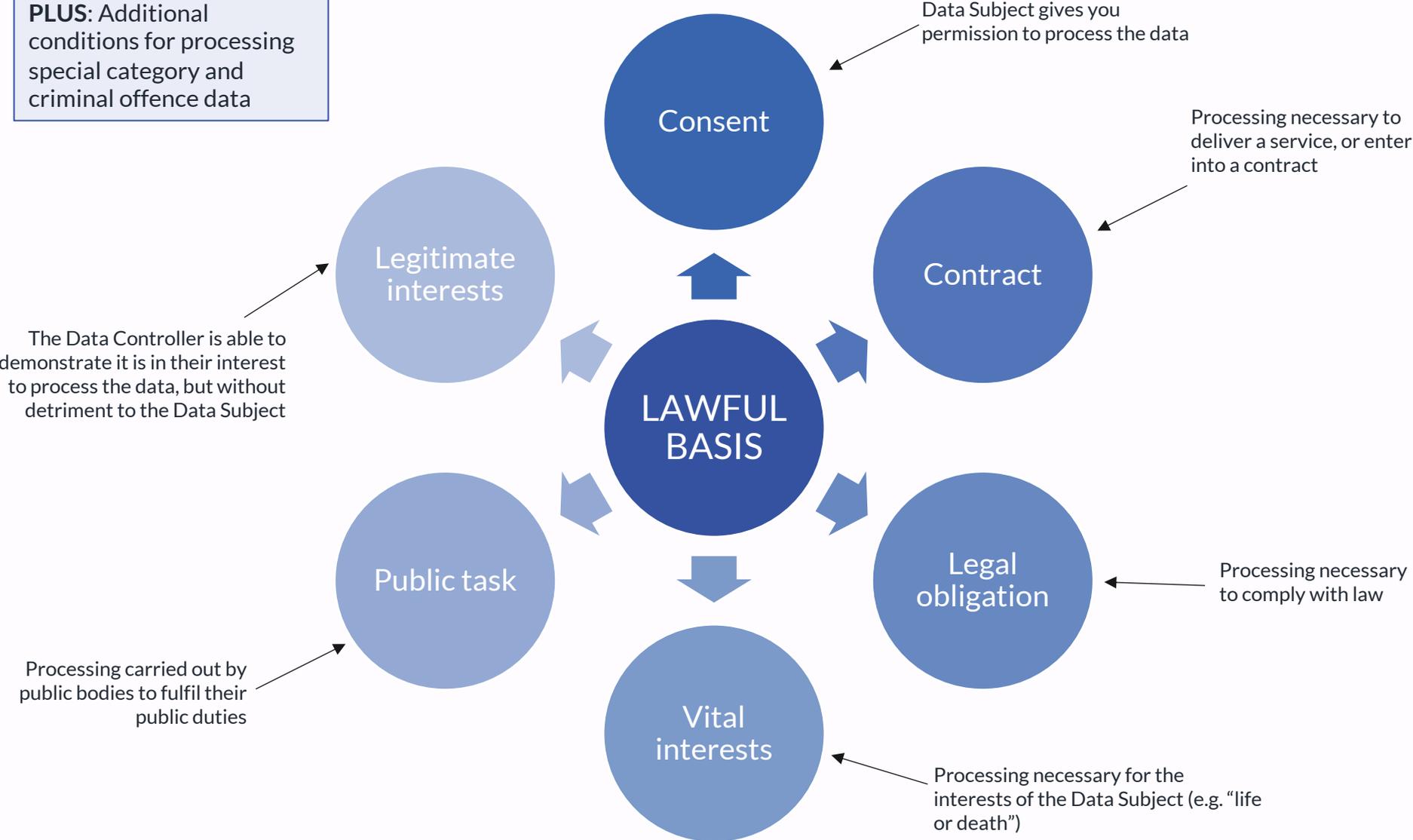
GDPR RECAP

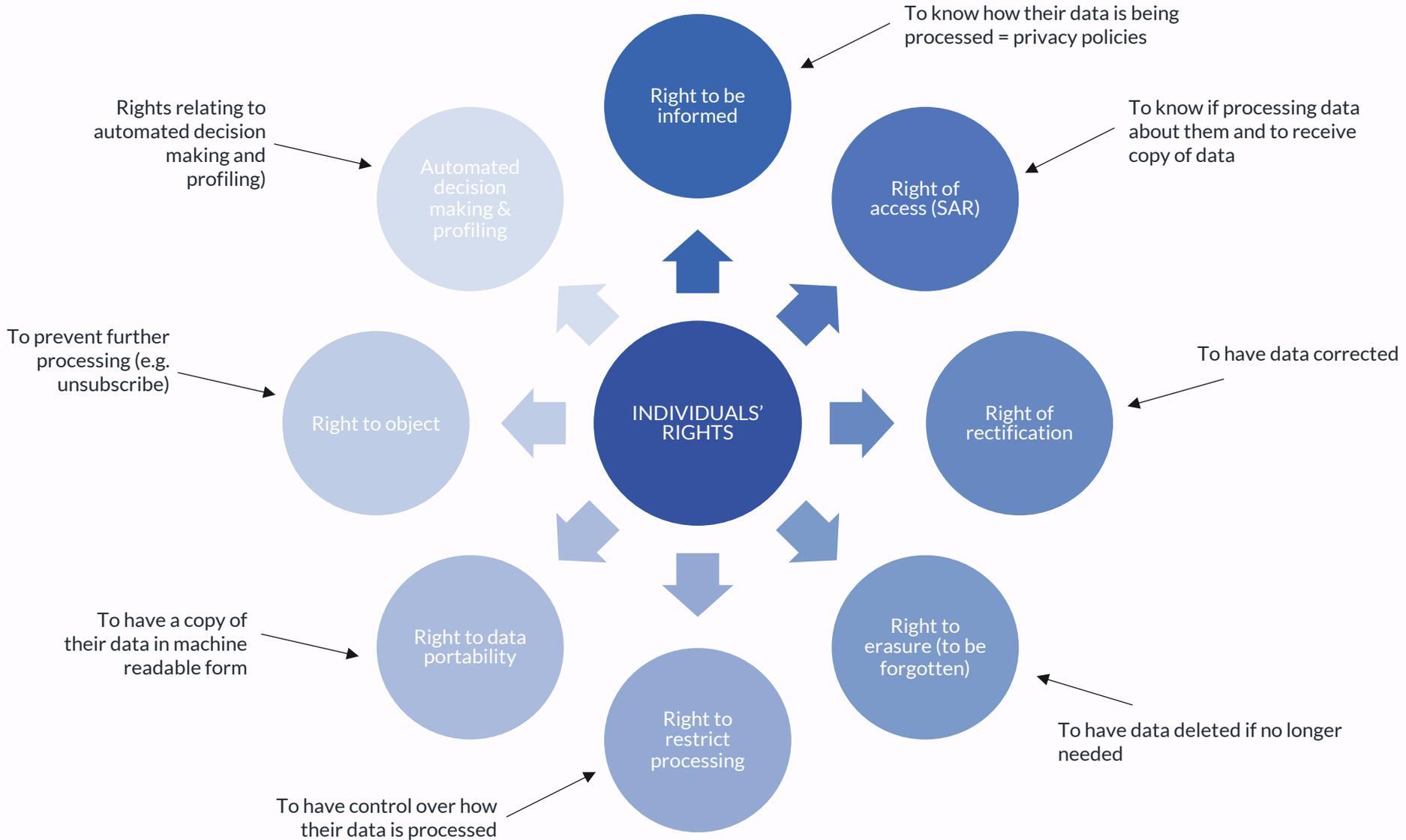


ALSO: Rules about data transferred outside the EEA (adequacy, agreement, contract)

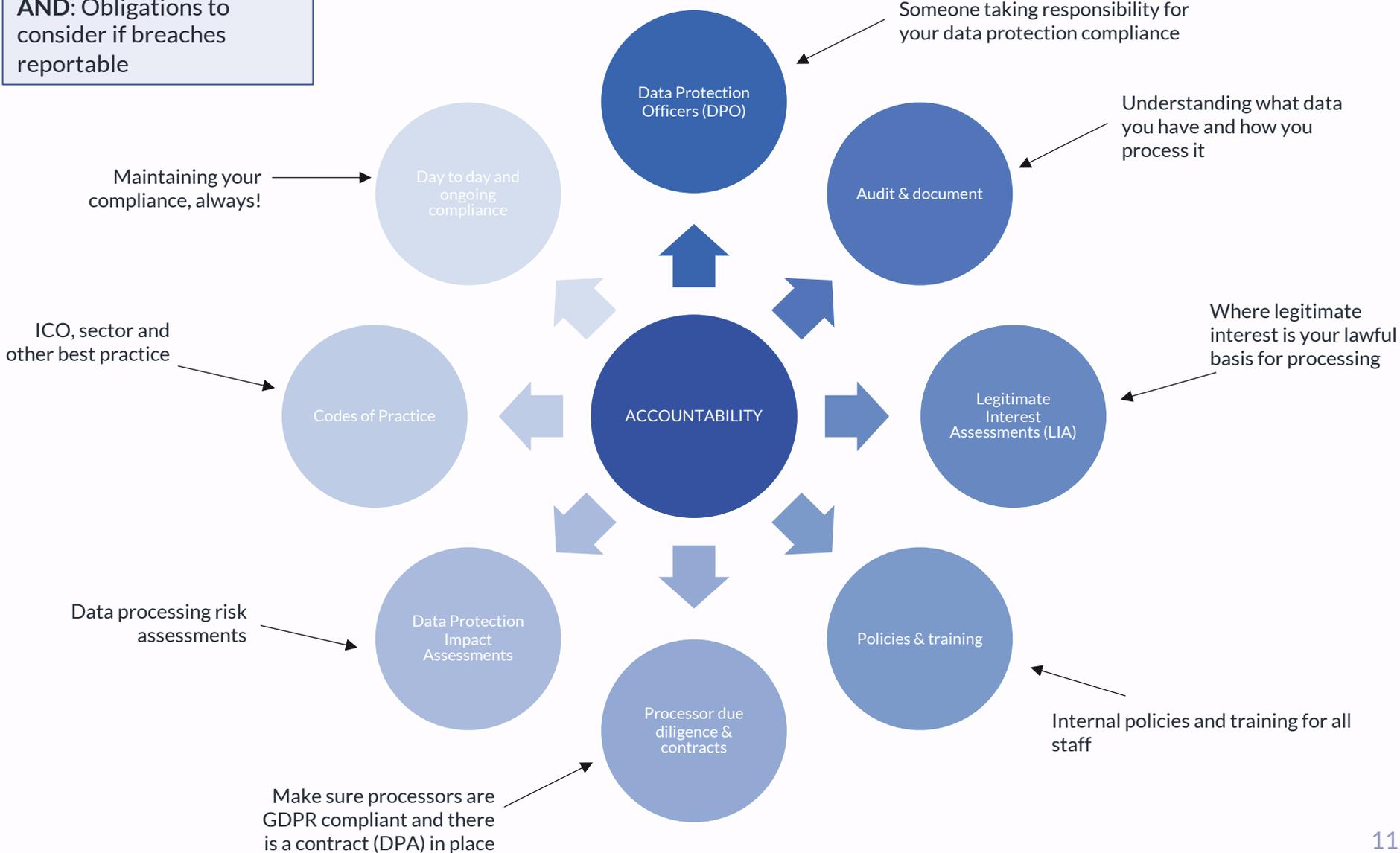


PLUS: Additional conditions for processing special category and criminal offence data

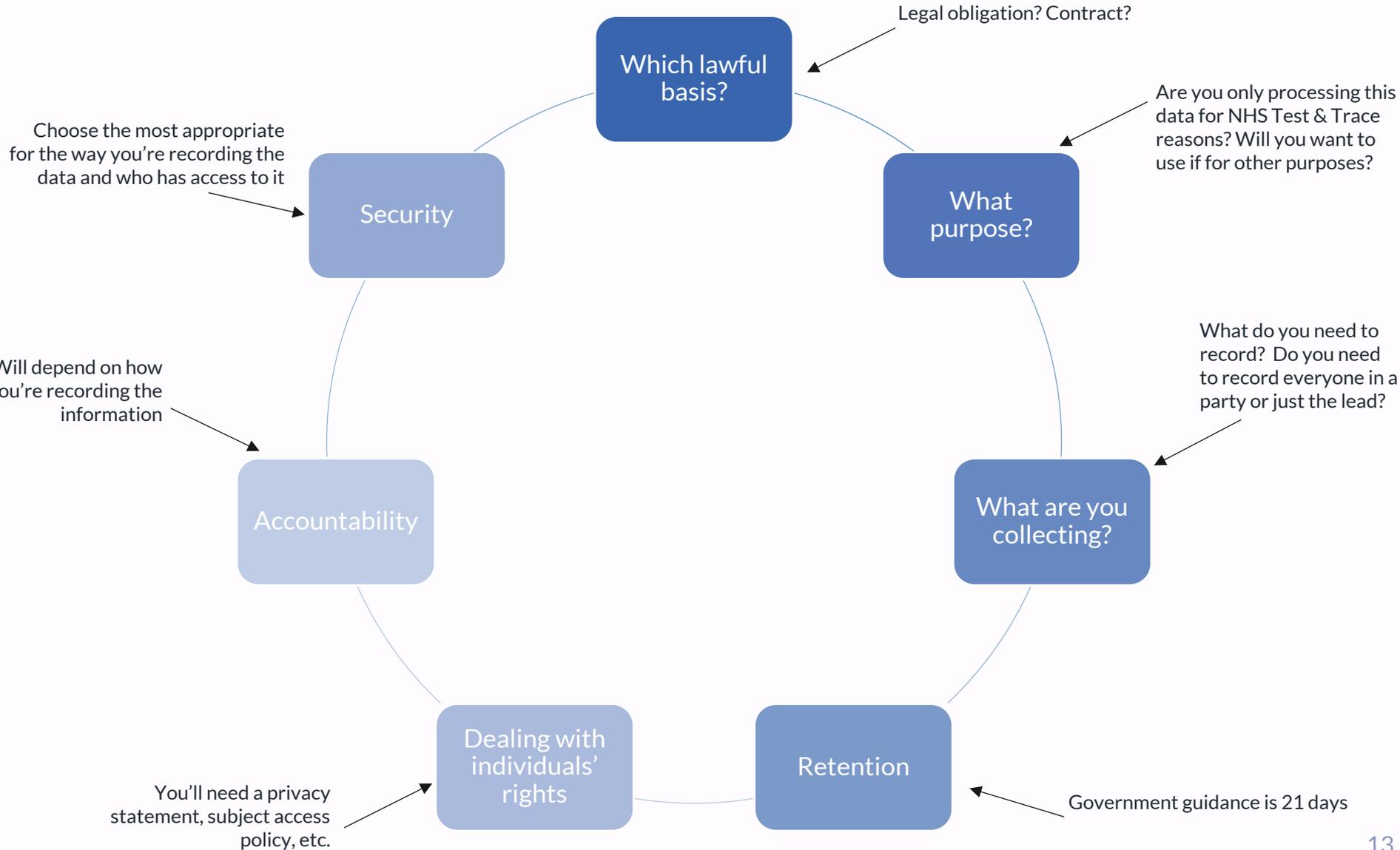




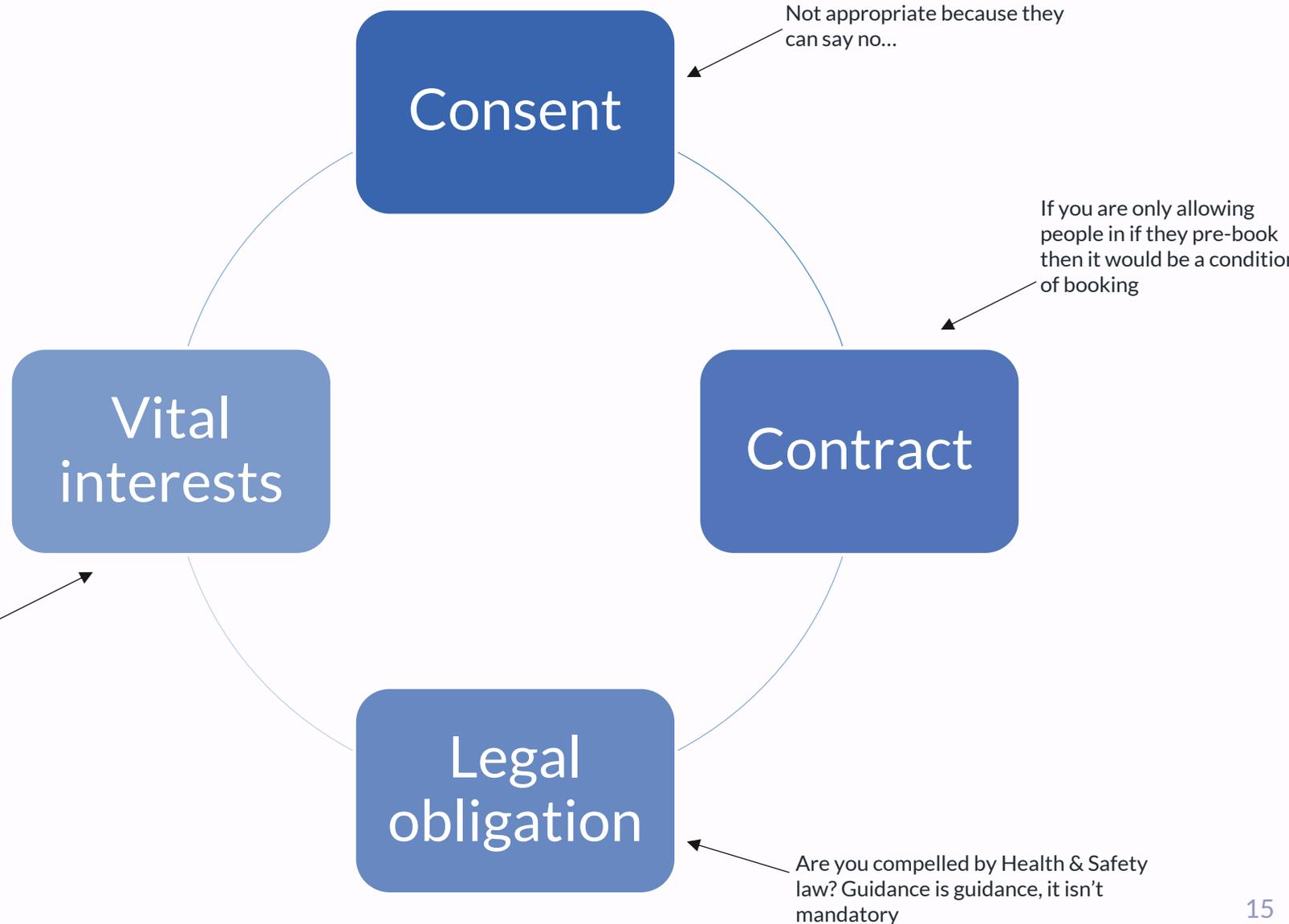
AND: Obligations to consider if breaches reportable

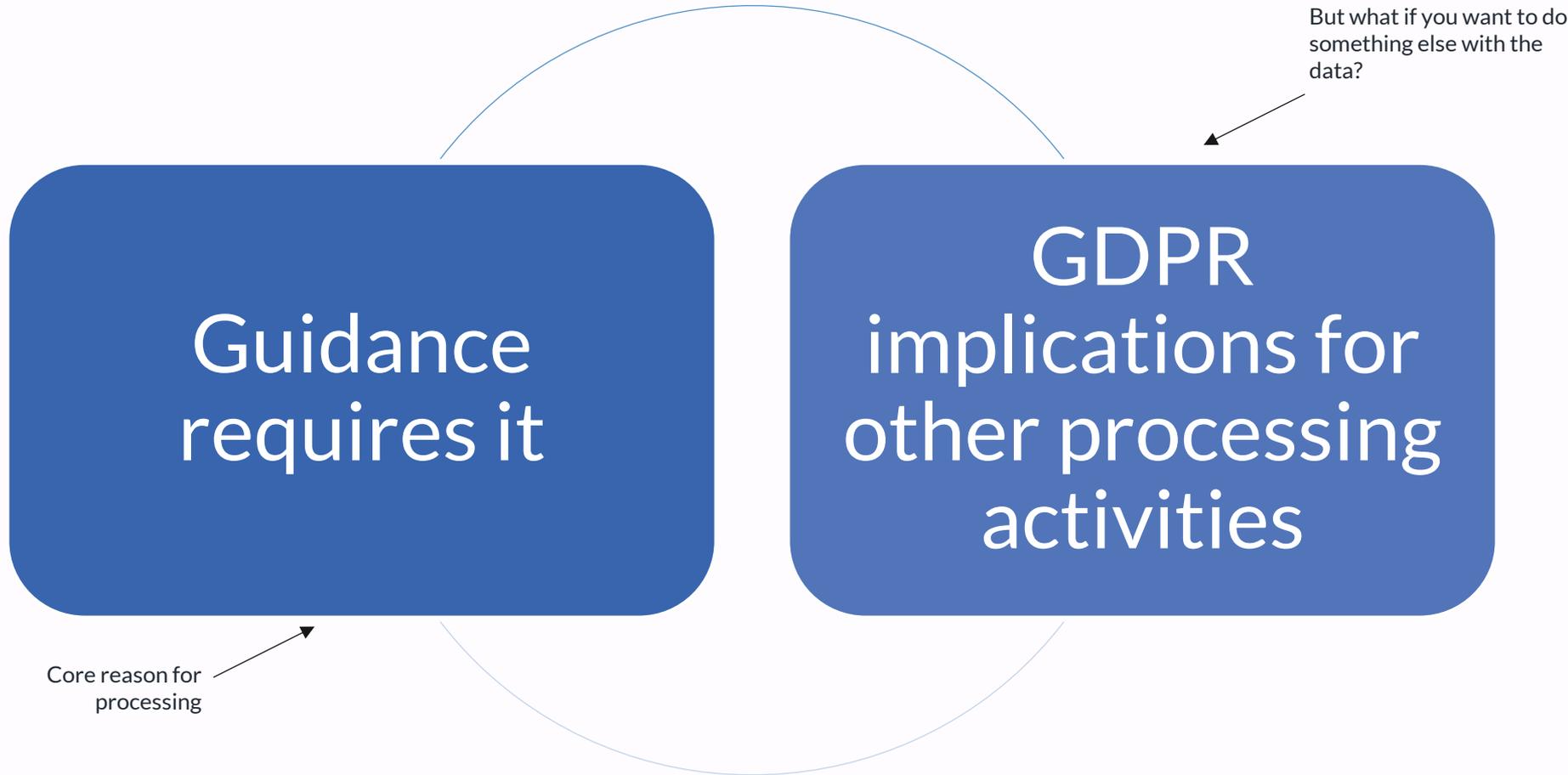


GDPR APPLICATION

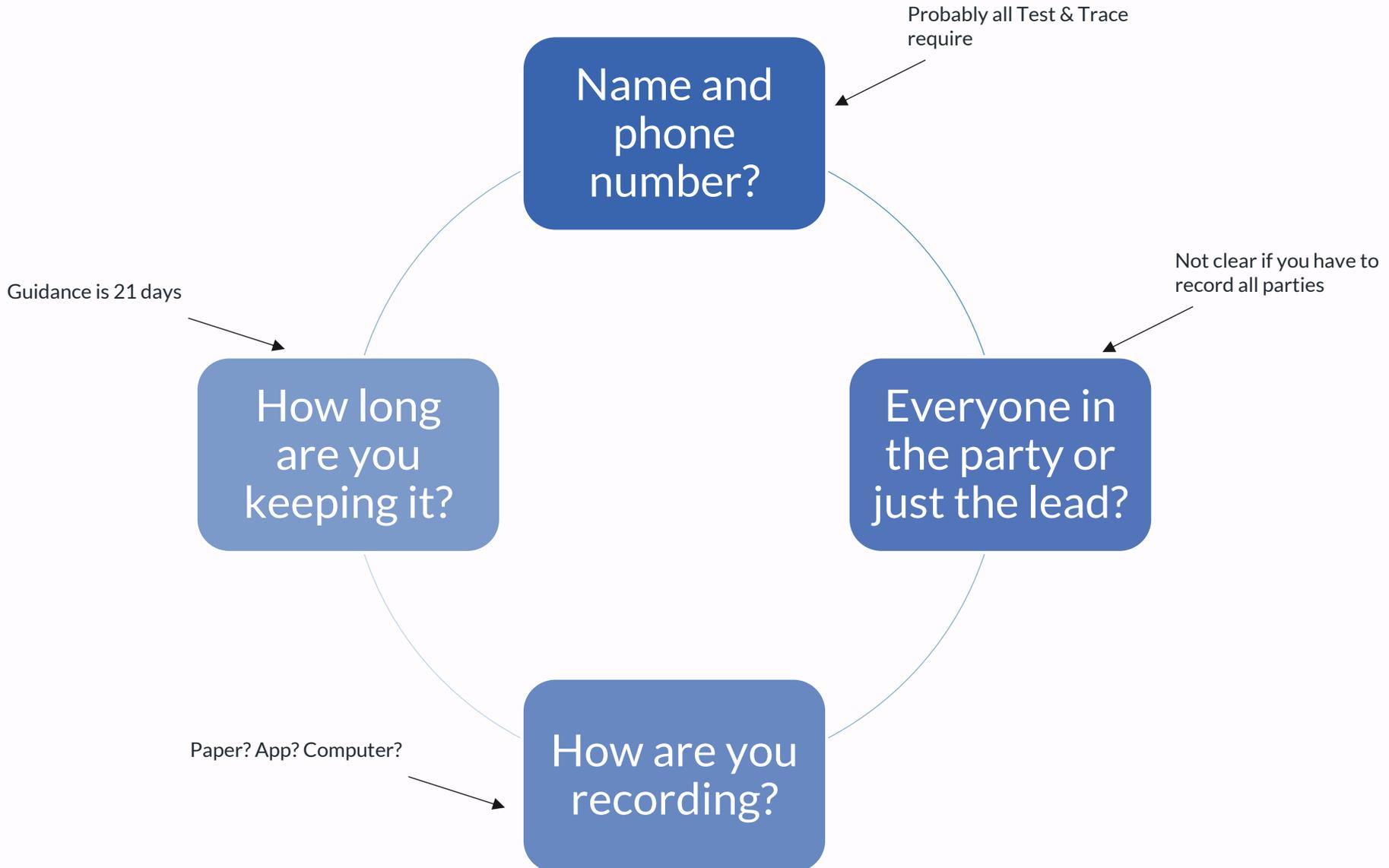




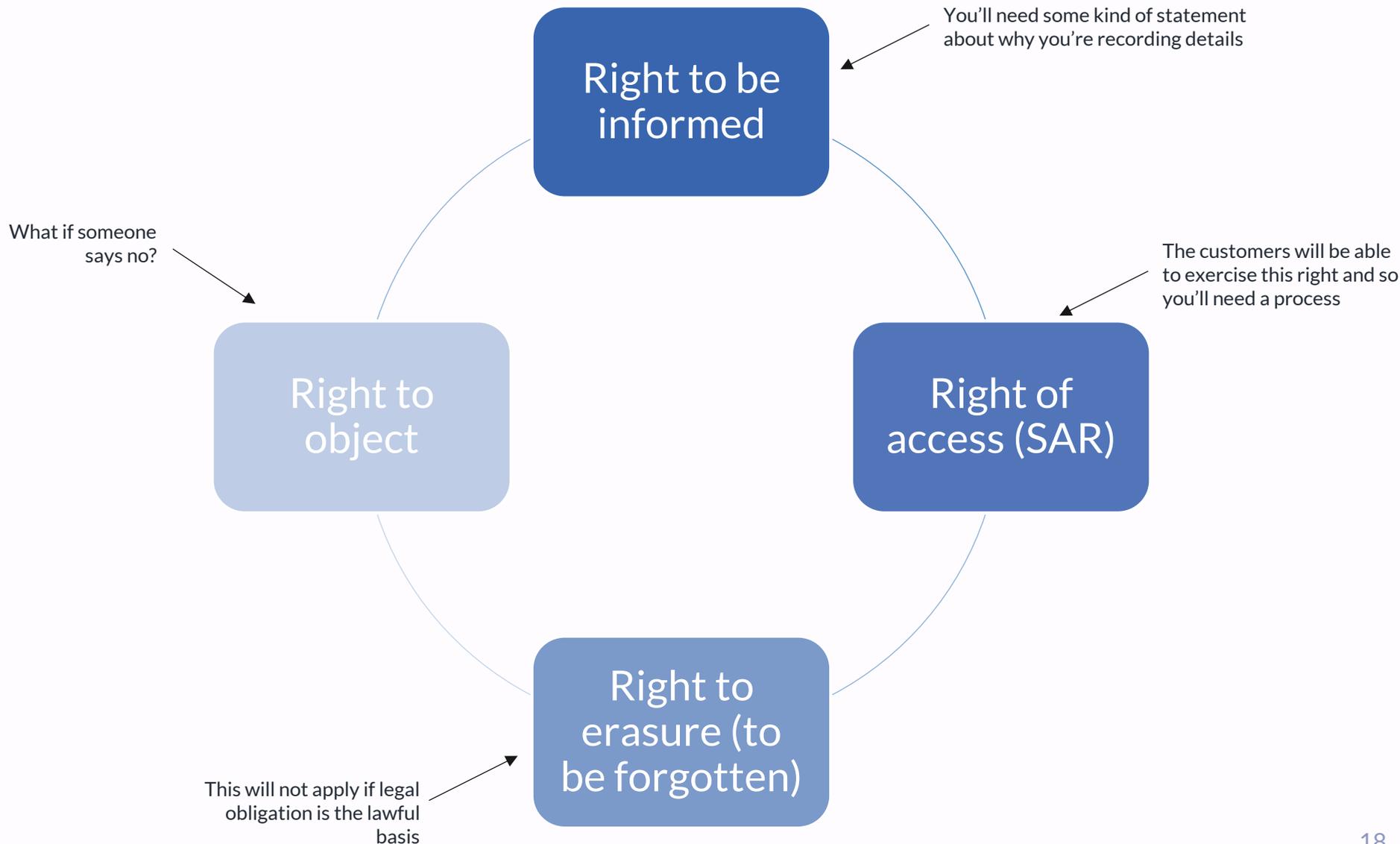


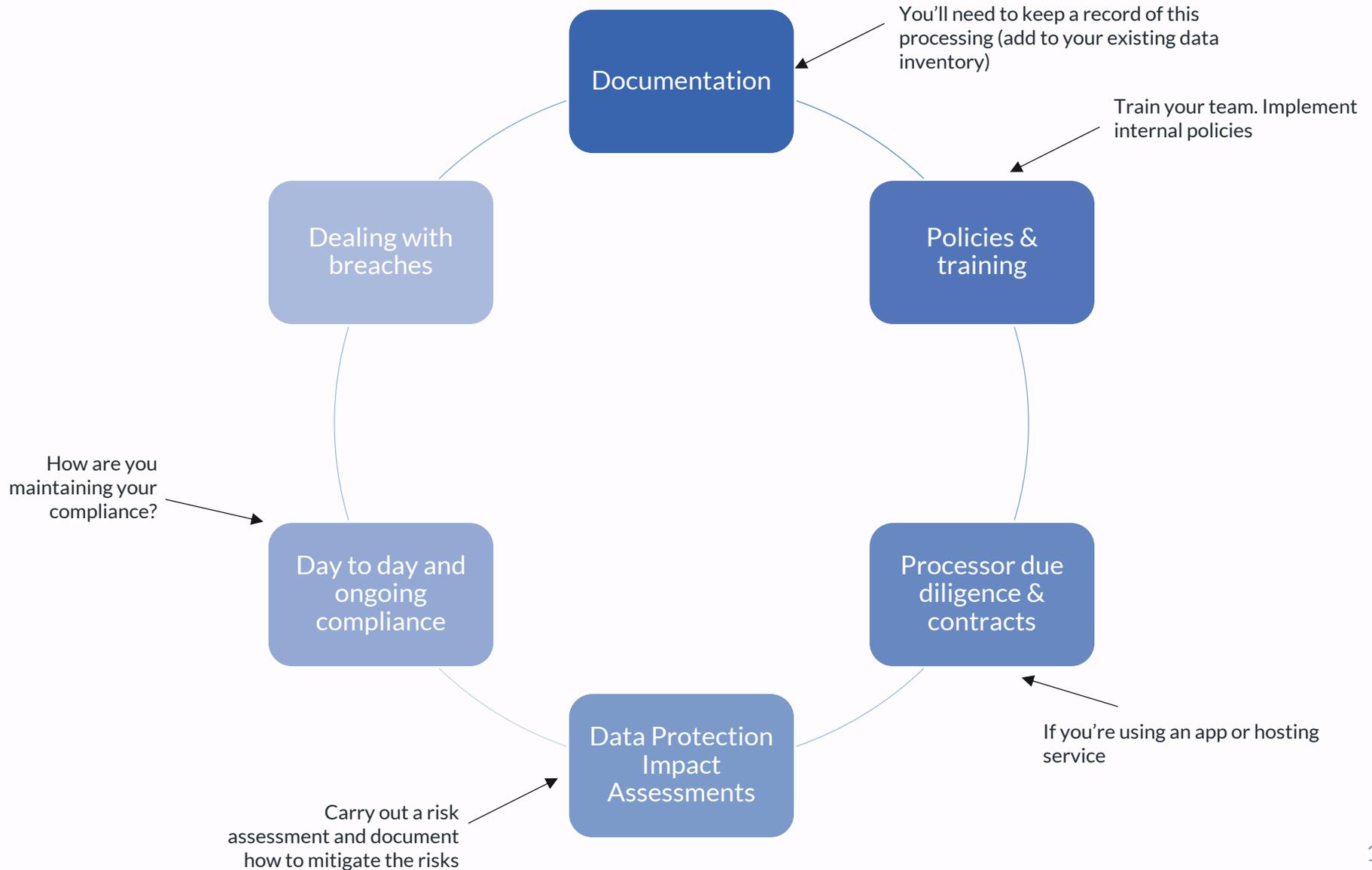


WHAT ARE YOU RECORDING?

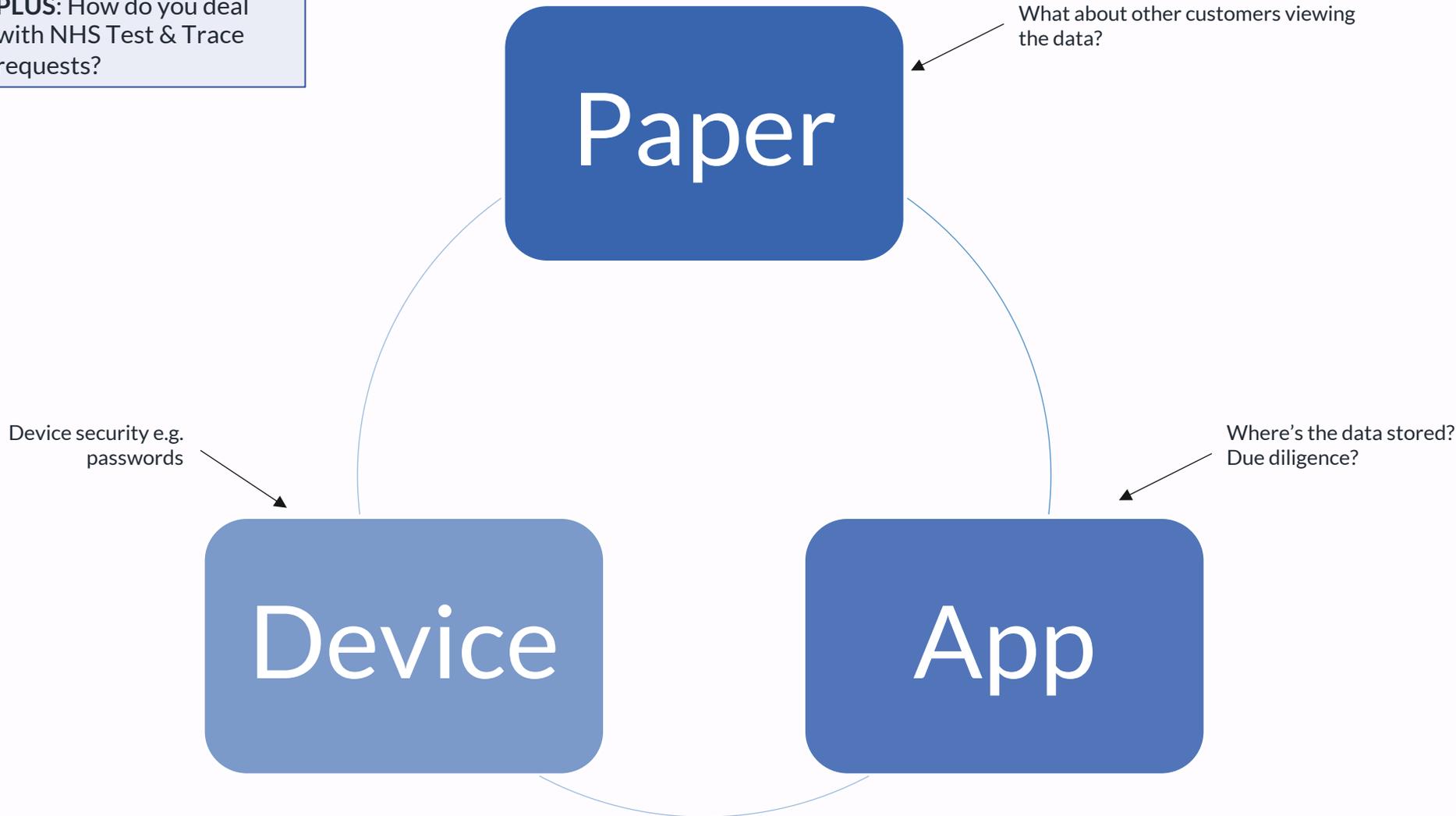


CONSIDER INDIVIDUALS' RIGHTS





PLUS: How do you deal with NHS Test & Trace requests?



1

Decide on your method for recording customer data

2

Carry out a risk assessment (Data Protection Impact Assessment (DPIA))

3

Determine your lawful basis for processing and apply the data protection principles

4

Put in place a privacy statement to inform customers what you'll use their data for

5

Carry out due diligence on any third-party processors who may be collecting or storing your data

6

Put processes in place for common compliance activities (e.g. dealing with breaches, subject access, right to erasure, etc.)

7

Put in place a process to ensure data is deleted at an appropriate time (e.g. 21 days)

8

Train your staff about GDPR basics and what the data can and cannot be used for

9

Put in place a process for dealing with NHS Test & Trace

10

Keep up to date on government or ICO advice

HERE TO HELP



GDPR DIY

- Online resources
- Fixed fee for support
- Step-by-step guides
- Policy templates
- Alerts & updates



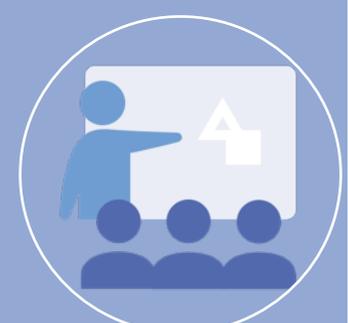
GDPR HELPLINE

- Unlimited support
- Online resources
- Alerts & updates



GDPR DPO

- Unlimited support
- Online resources
- Hands-on help
- Reviews
- Training
- Reports



GDPR PAYG

- Pay-as-you-go
- By the hour support
- Compliance reviews
- Privacy policies
- For start-ups
- Website compliance
- Training

Practical GDPR & ePrivacy support and advice whenever you need it

TO FIND OUT MORE: <https://markgraceygdpr.co.uk/services/>

Tuesday 30th June 12:00 - 13:00

BACK TO WORK: COVID-19 & GDPR COMPLIANCE



<https://markgraceygdpr.co.uk>

TIME FOR YOUR QUESTIONS & DISCUSSION



Mark Gracey GDPR

hello@markgraceygdpr.co.uk