

**COVID 19 - DATA PRIVACY COMMUNICATION**  
**TO INDEPENDENT CONTRACTORS**

Dear \_\_\_\_\_ [insert name and surname]

At \_\_\_\_\_ [insert name of Production Company/Producer] ("we", "our", "us"), the health, safety and well-being of our people is of the utmost important to us. As we continue in our efforts to contain the spread of coronavirus (**COVID 19**) we would ask you read the following information carefully which explains how we will process your personal data in this context.

***What you need to do***

- Please help us to ensure that the contact information we have for you is accurate and up-to-date.
- If you have not done so already, we would strongly encourage you to provide us with your non-work contact details (e.g. personal mobile number and personal e-mail address where available) so that we can reach you as quickly as possible where urgent notification is required. This is important for your own health and safety, and for that of other persons working on the production and the general public.
- Please **inform the Producer/Compliance Officer/Medical Officer immediately** and **stay at home** if you think that any of the following may apply to you:
  - you believe that you may have come into contact with an affected person; and
  - you develop symptoms and/or test positive for COVID 19.
- **The Producer/Compliance Officer/Medical Officer** will be able to guide you on next steps (e.g. self-isolation, when you may return to the production, etc.) based on the latest public health guidance in your area.

***How we will process your contact details***

- We will use your contact details to:
  - inform you of a potential exposure to COVID 19 of which we are aware (e.g. where a person you have come into contact with in a work context develops symptoms and/or contracts the virus);
  - communicate with you where you have been exposed to the virus including for the purpose of tracking and notifying other individuals with whom you have been in contact.
- The processing of your contact details for these purposes is necessary for our legitimate interests, to protect your vital interests, those of other persons working on the production and of other members of the public, as part of our efforts in the general public interest to contain the spread of COVID 19.
- Your contact details will only be used in connection with COVID 19 by **the Producer/Compliance Officer/Medical Officer** responsible for handling the tracking and notifications process.

- We will not disclose your contact details to any third parties, unless you have furnished us with your written consent to do so or if required by law or as strictly necessary to contain the spread of the virus having made all reasonable efforts to provide the necessary information on a non-identifiable basis.

### ***How we will process your health data***

In the context of managing the tracking and notifications process, we will need to process personal data relating to your health. This would be confined to facts such as: that you have tested positive/negative for the virus, that you have developed symptoms and are awaiting test results, that you have come into contact with an affected person or recently returned from an affected area, etc. It would not include information relating to your underlying condition. In some jurisdictions (e.g. South Africa), health data is afforded a higher level of protection than other types of personal data (e.g. your contact information).

In such circumstances:

- We will only process your health data as strictly necessary to notify individuals with whom you have been in contact for work purposes of a potential exposure. We will endeavour to do this on a no-names basis where possible.
- We will only process the least amount of health data necessary to manage the tracking and notifications process and for infection control purposes (e.g. that you have tested positive/negative for the virus, that you have developed symptoms and/or may have been exposed to the virus). We will not ask for detailed information regarding your condition.
- Your health data will only be made available on a strict need to know basis to a small senior management team responsible for handling the notifications process.
- We will not disclose your health data to any third parties, unless you have furnished us with your written consent to do so or if required by law or as strictly necessary to contain the spread of the virus having made all reasonable efforts to provide the necessary information on a non-identifiable basis.
- Our legal bases for processing your health data are that it is necessary for reasons of substantial public interest and for reasons of public interest in the area of public health.

For further information about how \_\_\_\_\_ *[insert name of Production Company/Producer]* processes your personal data and your rights in respect of that data, please contact **the Producer/Compliance Officer/Medical Officer.**

If you have any queries or concerns regarding the contents of this notice please contact **the Producer/Compliance Officer/Medical Officer.**