



COVID-19 SUPPLEMENTARY UPDATE TO VISTOR PRIVACY NOTICE

1. INTRODUCTION

We are publishing this supplementary notice as an addendum to our existing studio visitor [privacy notice](#) on a temporary basis whilst we respond to the unprecedented challenge of the coronavirus pandemic (COVID-19). The purpose of this notice is to provide you information about how we may seek to collect, hold and transfer your personal data and use it in ways that are different to how we would ordinarily do so in order to ensure your safety and well-being as a visitor and the safety and well-being of all of our staff and those that work at our studios.

When we say **we, our, us, or the Group** in this privacy notice, we are referring to Pinewood Group Limited (**PGL**) and its subsidiaries, Pinewood Studios Limited (**PSL**) and Shepperton Studios Limited (**SSL**), all of whom are "controllers" of your personal data for the purposes of the Data Protection Act 2018 (**Act**) and the EU General Data Protection Regulation 2016/679 (**GDPR**) (the Act and GDPR together the **Data Protection Legislation**).

2. Your personal data

In addition to the personal data we usually collect, we may collect and process the following personal data from you ahead of your visit to our sites or on arrival at our sites:

- Whether you or someone in your household are experiencing or have experienced COVID-19 symptoms in the last 7 days
- Whether you have received a positive or negative COVID-19 diagnosis
- Information relating to your COVID-19 self-isolation status (where applicable)
- Where you have received a positive COVID-19 test result, details of your recent contacts with other individuals whilst at work
- Details of any trips abroad in the last 14 days

Please note that we will not collect more information than is necessary and we will ensure that access to your personal data is strictly restricted and on a "need-to-know" basis only.

3. How your data will be used

In addition to the normal ways we use your data as part of the COVID-19 response we may need to process your data in different ways. If you confirm that you or anyone in your household have received a positive diagnosis of COVID-19 and/or you or anyone in your household have been experiencing COVID-19 symptoms before or at the time of arrival to our site, you will not be permitted access and we will request you follow government guidance and self-isolate, or if your symptoms are severe to seek medical attention immediately.

If you develop symptoms while you are on site, we may carry out 'contact tracing' in relation to any areas or persons you may have come into contact with. We will anonymise your personal data and not provide your name, but we may alert third parties, including other customers and users at the Studios, that someone experiencing COVID-19 symptoms and/or has received a positive diagnosis for COVID-19 may have come into contact with them. Please note where we anonymise your data, it will cease to become personal data under data protection legislation.

4. Legal basis for processing your personal data

The GDPR requires specific conditions to be met to ensure that the processing of your personal data is lawful. The legal basis that we rely on will be determined by the specific purposes and context of the processing. However, the relevant conditions are:

- **Article 6(1)(c) GDPR** – Legal Obligation – the processing is necessary for compliance with a legal obligation to which we as data controller are subject, namely the Health and Safety Act 1974 as amended
- **Article 6(1)(f) GDPR** – Legitimate Interests – the processing is necessary in the legitimate interests of us as data controller in terms of maintaining a safe and healthy workplace and managing business continuity.

Where we use special category personal data we will process this under the GDPR exemption Article 9(2)(b) for employment, social security and social protection purposes, along with reference to Schedule 1 (Part 1) DPA 2018 as the processing is necessary for the performance or exercise of obligations or rights which are imposed or conferred by law on us as the controller in connection with employment. Specifically, as a UK employer, under the Health & Safety at Work Act 1974, we have a duty to take reasonable steps to look after the health, safety and welfare of persons on site and in meeting this duty we will process personal data only where it is necessary and proportionate to do so.

5. How we will keep your information secure

In addition to the existing measures detailed in our visitor [privacy notice](#) that ensure your data is kept secure, we have produced clear instructions and developed clear reporting lines in relation to information processed in light of COVID-19. The Pinewood COVID-19 Taskforce has oversight and responsibility for data gathered in relation to COVID-19, and in the sharing of data only where reasonably necessary to maintain the health, safety and welfare of all persons at the Studios.

6. Storage and retention of your personal data

Personal data collected will be held in accordance with our existing storage procedure as detailed above in our main visitor [privacy notice](#). We will only retain your personal data which has been collected as a result of COVID-19 for as long as it is necessary, taking into account both Government as well as ICO guidance in relation to the management of the pandemic and the ongoing risks presented by COVID-19. At a minimum, the data outlined in this supplementary privacy notice will be kept for the duration of our COVID-19 response. Where we do not need to continue to process your personal data, it will be securely destroyed.

7. Your rights

Under data protection law, you have a wide range of rights, full details of which can be found above in our privacy notice.

8. Any questions

If you have any questions or concerns about the contents of this notice or any of our data protection policies, please contact dataprotection@pinewoodgroup.com.

9. Updates to this notice

Please note that we may amend this supplementary visitor privacy notice at any time so please review it frequently.