SAGA CRUISES PRIVACY POLICY - COVID-19 TESTING

Last updated: 26 August 2021

When it comes to your privacy, we never compromise. We will always be clear about why we need the details we ask for, and ensure your personal information is kept as secure as possible. How we do this in relation to coronavirus (COVID-19) and other health screening requirements is explained below.

Purpose

This privacy policy gives you information about how Saga Cruises Limited (Saga) collects and processes your personal data relating to COVID-19 testing and our other health screening requirements necessary for your cruise. It is important you read this document together with any other privacy or fair processing policies we give you on specific occasions where we collect or process your personal data. This privacy policy supplements the Saga Group Privacy Policy, available <u>here</u>.

How we collect and use your information

Saga, its subsidiaries or its processors may administer COVID-19 testing and other health screening at any time prior to or after boarding. In addition to having a COVID-19 test, all guests are required to complete our pre-boarding health questionnaire, comply with any other necessary health screening requirements and supply full and accurate information of any symptoms of or positive tests for viral or bacterial illness.

In relation to COVID-19 testing, your data will be collected and processed by Saga and its appointed COVID-19 testing provider, Collinson Assistance Services Limited. In line with public health requirements, such data will be submitted to Public Health England. All information in these databases is held securely and access to this information is tightly governed, in line with data protection requirements. Further information is available in the UK Government COVID-19 testing privacy policy, here.

In relation to health screening requirements, data is collected and processed by Saga in hard copy format. We will use the data to identify passengers who may have an infectious disease for further screening prior to permitting/denying boarding.

Saga will be considered a data controller for the purposes of data protection legislation, since it decides what information will be collected and processed. During the process, other organisations including Public Health England may have data controller status.

What personal data we will collect

We will collect the following data as part of our COVID-19 testing process:

- first and last name
- date of birth
- gender
- Contact address
- Contact Phone number
- Email address
- test results (positive, negative or unclear)

The following data will also be collected as part of our health screening process:

- Travel activity in preceding 14 days prior to embarkation
- details and date of onset of symptoms
- vaccination status (visual check of vaccination documentation as well as recording date and vaccination type to authorities in ports of call)
- temperature and blood oxygen saturation level

Purposes your data will be used for

Saga is the data controller for the following purposes:

- administering and processing your COVID-19 test
- booking a COVID-19 test on arrival in the UK where required by the UK Government
- recording your results and issuing a certificate where required by authorities in ports of call
- returning your results to you
- contacting you (if you test positive)
- sharing results with Public Health England to help plan and respond to COVID-19
- collecting data relating to health screening
- identifying any risk of infectious diseases for the purposes of further screening or preventing boarding
- assisting you to complete locator forms for foreign ports of call and when returning to the UK, which will include receipt of email confirmations and onboard printing.

Your information collected for the purposes of COVID-19 testing will not be used for any purposes other than those described in this policy, except where required by law. We acknowledge the rules regarding COVD-19 and overseas travel may change quickly and therefore where any further processing is required by law we will update this privacy policy and make a copy available to you as soon as possible.

Data processors

Organisations who use your data and information on behalf of a data controller are known as data processors and can only use your data and information with clear instructions from the data controller. They cannot use your data and information for any other purpose. Any use of information that is not covered by the instructions from the data controller would be unlawful, unless the data controller agrees and provides written permission to do this.

Saga has appointed Collinson Assistance Services Limited as a data processor for the purposes of:

- overseeing the logistics of test administration; and
- collecting and forwarding test data to Public Health England.

Lawful basis for using your information

We will only use your personal data when the law allows us to. In relation to the processing of your personal data for the purposes of COVID-19 testing and our health screening requirements, Saga' will use your personal data in the following circumstances:

- where the processing is necessary for our legitimate interests (or those of a third party), except where such interests are overridden by your interests or fundamental rights and freedoms which require protection of personal data; and
- where the processing is necessary for reasons of public interest in the area of public health.

Public Health England will process your data with a legal basis of their own, and you should seek to contact them for details of their privacy policy.

Your rights as a data subject

Full details of your rights as a data subject are available within the Saga Group Privacy Policy, available at <u>www.saga.co.uk/privacy-policy</u>.

Retention and storage of your data

We will retain your personal data collected for the purposes of COVID-19 testing for up to three months from completion of your cruise. Personal data will be stored securely following collection. Following this retention period, personal data collected for the purposes of COVID-19 testing will be securely destroyed.

Data Protection Officer

Saga's Data Protection Officer can be contacted by sending an email to <u>data.protection@saga.co.uk</u>.

Information Commissioner's Office

You have the right to lodge a complaint with the Information Commissioner's Office (the ICO) if you feel your personal information has not been handled correctly. You can do this via <u>www.ico.org.uk/concerns</u> or by writing to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.