

SOP: UCD NVRL Data Privacy Notice	
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Privacy Notice for the UCD National Virus reference Laboratory

This is the Privacy Notice of the UCD National Virus Reference Laboratory (NVRL, “We”, “Us”). The NVRL operates under the governance of University College Dublin (UCD). This Privacy Notice explains how personal data is collected, used, stored, shared, and protected by the NVRL, and sets out your rights in relation to the processing of your personal data.

We fully respect your right to privacy and are committed to protecting your personal data. Any personal data processed by the NVRL will be processed fairly, lawfully and transparently and handled with the highest standards of security and confidentiality in accordance with applicable Irish and European data protection legislation.

The privacy notice explains the following:

- Who we are
- How we collect and use your personal data
- The purpose and legal basis for collecting your personal data
- Details of third parties with whom we share personal data
- Transfers outside the EU/EEA
- How long do we retain your data
- Your rights under data protection legislation
- Cookie Policy
- CCTV
- Further Information
- Contact Details of the Data protection Officer

1. Who We Are

The UCD National Virus Reference Laboratory (NVRL) is a virology reference laboratory, providing diagnostic, reference and clinical liaison services to healthcare providers, including hospitals, general practitioners and other authorised clinicians, to support the diagnosis and management of infectious diseases.

The NVRL is part of University College Dublin (UCD) and is accredited by the Irish National Accreditation Board (INAB) to the ISO 15189 standard for medical laboratories. Details of our accreditation are available on the INAB website under: [National Virus Reference Laboratory ISO15189 - INAB](#)

2. How we collect and use your personal data

Where the NVRL provides a service, we receive personal data from the healthcare provider, clinics, hospital or other authorised organisation ("the Requester") that collected your sample and submitted it to the NVRL for laboratory testing or analysis.

We receive the following categories of personal data periodically from the healthcare providers:

- **Patient details:** We receive patient information from the Requester, including details such as your name, date of birth (where applicable), hospital or patient identification number, and other information necessary to identify your sample and perform the requested laboratory tests or infectious disease screening. This information is recorded in our Laboratory Information Management System (LIMS).
- **Healthcare professional information:** We receive the contact details of the requesting healthcare professional (such as their name, hospital or practice, telephone number and email address). This information is used to communicate test results, clarify requests and, where necessary, verify patient information. These details are also recorded in the LIMS.

Where the NVRL collects data for NVRL operational reasons, we collect personal data from or about individuals directly.

- **Visitors to the UCD NVRL:** When visitors who are not members of NVRL staff enter our premises, we record their name, organisation (where applicable), date and time of visit in a visitor log for security and health and safety purposes. Visitor records may be scanned and stored electronically.
- **UCD NVRL staff recruitment:** Before appointing a staff member to UCD NVRL, we collect certain personal information, including their name, contact details, relevant medical history, and vaccination records. This information is assessed by Corporate Health Ireland to determine whether the individual is medically fit to work in an environment where biological samples are handled and tested for infectious diseases. For more details on the UCD staff HR Privacy Policy see: [UCD HR Privacy Statement - Employee](#)

3. The purpose and legal basis for processing personal data

Where the UCD NVRL performs diagnostic testing on patient samples submitted by healthcare providers, it processes personal data under instructions in accordance with the conditions of Article 28 GDPR, where applicable, and the terms of the relevant Data Processing Agreement or other contractual arrangements governing the processing.

Where the UCD NVRL processes personal data for the purpose of the mandatory notification of infectious diseases under the Infectious Diseases Regulations Amendment No 3 (S.I. No. 707/2003), as amended the lawful basis for processing personal data is Article 6(1)(c) GDPR, as the processing is necessary for compliance with a legal obligation to which the NVRL is subject to notify the relevant Medical Officer of Health (MOH) or Director of Public Health (DPH) of prescribed infectious diseases. Where this processing involves special category personal data concerning health, the applicable condition under Article 9(2)(I) GDPR applies, as the processing is necessary for reasons of public interest in the area of public health.

Processing activity	Personal data	Purpose of processing	Legal basis for processing
Conducting diagnostic testing on patient biological samples	Healthcare provider, contact information, Patient details and biological samples	To fulfil a Healthcare provider's diagnostic testing requests and delivery of patient test results to the healthcare provider	UCD NVRL performs diagnostic testing on the direct instructions of the healthcare provider as a data processor.
Public health reporting	Patient test results	We are required by law to notify the relevant Medical Officer of Health (MOH) or Director of Public Health (DPH) when specific notifiable infectious diseases are identified during diagnostic testing of patient's biological samples	Article 6(1)(c) GDPR, as the processing is necessary for compliance with a legal obligation Article 9(2)(I) GDPR applies, as the processing is necessary for reasons of public interest in the area of public health.
Updating visitor logs (Temporary UCD NVRL visitors)	Contact information	We collect limited guest personal data where necessary to comply with our legal health and safety obligations, including managing access to laboratory areas where biological hazards may be present	Article 6(1)(c) GDPR, as the processing is necessary for compliance with a legal obligation
Medical health screening for UCD NVRL staff	Vaccine records	We collect staff medical records to ensure staff are medically fit to work in an environment where biological samples are handled and tested for infectious diseases.	Article 6(1)(c) GDPR, as the processing is necessary for compliance with a legal obligation Article 9(2)(H) GDPR applies, as the

			processing is necessary for the assessment of the preventive/occupational medicine and assessment of an employee's working capacity
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4. Details of third parties with whom we share your information with

We only share your information where necessary for the purposes of processing outlined in this Privacy Statement.

The following table details the third parties with whom your personal data is shared together with the purposes for the sharing:

Third-Party Recipients	Purpose for sharing
Healthcare providers	To process diagnostic samples submitted by clinicians or hospitals and to communicate the resulting test results to the requesting healthcare provider.
Eurofins Biomnis Ireland Limited, World Courier)	To return and receive biological samples and/or test results to clinicians or hospitals
DX Ireland	To send biological samples to referral laboratories
An Post	To send test results to clinicians
Computerised Infectious Disease Reporting (CIDR) and successor Outbreak, Case, Incident Management & Surveillance Programme (OCIMS)	To comply with legal and regulatory obligations to report certain infectious diseases identified through sample testing. Where required by law, information is shared with the Computerised Infectious Disease Reporting (CIDR) system to notify the relevant Medical Officer of Health (MOH) or Director of Public Health (DPH). This information is used to investigate cases, support the early identification of outbreaks, and help prevent the spread of infectious diseases.
Kefron	Provide long-term secure storage in a locked facility for the UCD NVRL administrative documentation and backup tapes
Corporate Health Ireland	To provide independent occupational health assessments for prospective NVRL laboratory staff to determine their fitness for work and identify any workplace adjustments or restrictions required to enable them to work safely in the laboratory.
DMF Systems	Supplier of the Medibridge system used to process lab results

Medical Supply Company	Provide integration engine for the UCD NVRL Laboratory Information Management System (LIMS)
Dataway	Technical support and maintenance of the UCD NVRL firewall
Sage	To archive financial invoices
DGD shredding	To confidential shredding of paper documentation
Action 24	Technical support and maintenance of the security surveillance cameras at the UCD NVRL

5. Transfers Outside the EU/EEA

We may store or share your data outside the EEA in the following limited circumstances. Please note that prior to any processing of data outside of the EEA the processing activity of the data will undergo a rigorous checking process to ensure that all relevant safeguards are in place. In such circumstances, the transfer will be in compliance with applicable Irish and European data protection laws. We take reasonable steps to ensure that the Personal Data is treated securely including using appropriate safeguards such as an Adequacy Decision, or the Standard Contractual Clauses as approved by the European Commission.

Third-party Processor	Country	Purpose For Sharing
Clinisys	United Kingdom	To obtain technical support and maintenance for the Laboratory Information Management System (LIMS), where access to user access logs may be necessary to diagnose, investigate, and resolve technical issues.
Access UK LTD	United Kingdom	To obtain technical support and maintenance for the NVRL staff Team Seer accounts
Rare and Imported Pathogens Laboratory (RIPL)	United Kingdom	Provides the following tests as required; Arthropod borne viruses, Haemorrhagic fever viruses, Hantavirus, Leptospira icterohaemorrhagiae, Borrelia burgdorferi
IDEAGEN Technical Support Team	United Kingdom	To obtain technical support and maintenance for the UCD NVRL document management system provided by

		IDEAGEN, where access to user account information or audit logs may be necessary to diagnose, investigate, and resolve technical issues
Toxoplasma Reference	United Kingdom	Provide Toxoplasma gondii confirmatory testing as required
Virus Reference Department, Microbiology Services	United Kingdom	Provides Hepatitis C resistance and Hepatitis Delta testing as required
Bacteriology Reference Department	United Kingdom	Provides Lymphogranuloma venereum (LGV) testing as required
Clinical Microbiology and Virology, UCL NHS	United Kingdom	Provides HIV 2 RNA viral load testing
Microbiology Department, MFT	United Kingdom	Provides fluoroquinolone antibiotic resistance testing for Mycoplasma genitalium - positive samples as required.

6. How long do we retain your data

We retain your personal data and test results only for as long as necessary to fulfil the purposes outlined in this notice, or as required by applicable retention guidelines set by your health care provider. When data is no longer needed, it is securely deleted or shredded.

7. Your Privacy Rights

Note on Exercising Your Rights:

If your test sample was referred to the UCD NVRL by your healthcare provider and we process your personal data on their behalf as a data processor, we recommend that you direct your privacy rights request to your healthcare provider in the first instance. As the data controller, your healthcare provider is responsible for your primary healthcare relationship and is best placed to assist you with your request and provide the information you need. When required, we will fully support your healthcare provider in responding to your request.

Where your relationship with the NVRL is not via a health care provider, but with UCD directly, your request will be handled by UCD directly.

Under the General Data protection Act you have the following rights:

- Right of Access: Request a copy of the personal data and test results we hold about you.
- Right to Rectification: Request the correction of inaccurate demographic or administrative information.

- Erasure / Restriction: Request the deletion or restriction of your data (subject to legal mandates requiring us to retain medical records).
- Right to restrict processing: You can request the restriction of processing where: (i) You contest the accuracy of the personal data. (ii) You oppose the erasure of the personal data and request restriction instead. (iii) UCD no longer needs the data but are required by you for the establishment, exercise or defence of legal claims
- Right to object to processing: The right, in certain circumstances, to request that your personal data is no longer processed for purposes,
- Right to data portability: You can request and receive a copy of this data, in electronic/transferrable format, at any time.
- The right not to be evaluated on the basis of automated processing, including profiling.

8. Cookie policy

UCD NVRL webpages are managed by University College Dublin (UCD) and are governed by [UCD's Cookie Policy](#). No separate cookie controls or trackers are applied by UCD NVRL.

9. CCTV

CCTV is in operation at the UCD NVRL premises for the purposes of ensuring the safety and security of staff, visitors, and property. Cameras are positioned covering entrances, and exits. The footage is only accessed when necessary, such as in the event of an incident or suspected breach of security, and is retained for a limited period in accordance with our CCTV Policy. There is no live monitoring in place.

Access to CCTV footage is strictly limited to authorised personnel, and where required, may be shared with An Garda Síochána or other relevant authorities in accordance with applicable law.

10. Further Information

If you have any queries in relation to this privacy statement, or if you have any concerns as to how your data is processed, please contact UCD NVRL at nvrl@ucd.ie

11. Contact Details of the Data Protection Officer

If your relationship is with UCD directly, please contact the Office of the UCD Data Protection Officer either by email data.protection@ucd.ie or in writing to:

Office of the DPO
Roebuck Castle
University College Dublin
Belfield, Dublin 4, Ireland.

If you are not satisfied with our response, you have the right to **lodge a complaint with the Data Protection Commission** at www.dataprotection.ie

Updates to This Notice

We may update this Data Privacy Notice from time to time to reflect changes in our practices or legal obligations. The "Effective Date" at the bottom of this page will indicate when it was last revised.

Document History

Edition	Change Description
1.0	New document