

Inspection of persons entering company premises during the coronavirus pandemic in compliance with GDPR

This overview outlines the essential dos and don'ts of potential preventative measures associated with the presence of persons in company premises, whether employees, visitors, couriers or anyone else.



Upon the entry of any person into your premises, you may:

Record all visits and their duration

Inquire whether a person has recently visited any high-risk countries

Inquire whether a person is aware of recently being in close contact with an infected person

Limit unnecessary interaction between persons

Ensure that all persons wear face masks or other facial protection at all times

Create the conditions for maintaining a safe distance of at least two meters between persons

Support the use of cashless payments



We would generally recommend refraining from:

Systematically / continuously measuring body temperatures or otherwise monitoring health conditions

Requesting a wide range of information on health conditions

Requesting filling out of comprehensive questionnaires about potential symptoms and health conditions

Making entry into the building conditional upon the granting of consent with the processing of the abovementioned data

Making entry into the building conditional on providing medical certificate

Using CCTV cameras to collect information about potential symptoms

Installing thermal cameras to collect information about potential symptoms

When implementing any preventive measures, you should adhere to the following:

- Consider whether such measures are appropriate and necessary and whether a suitable and less intrusive alternative is available;
 - Provide transparent information on adopted measures, their purpose and the associated processing of personal data – for example by way of notification at reception and a written notice distributed to each person upon entry;
 - Ensure the protection and security of the collected personal data – in particular ensure that only authorised persons are able to access such data;
 - Do not use such data for a different purpose than for which they were collected;
 - The data collected should only be stored for the necessary time period, i.e. a maximum of two weeks.
-

For more information please contact Štěpánka Havlíková per email at stepanka.havlikova@kinstellar.com or Tereza Mašková at tereza.maskova@kinstellar.com