

# Health & Safety Passport System (HSPS) Privacy Notice

HS2 Ltd. will process the personal data that you provide to us in accordance with our Privacy Notice ([Privacy policy - HS2](#)).

This notice aims to provide details regarding the specific purposes in which we are processing your personal data in respect of the Health & Safety Passport System.

## 1. The Type of Personal Information We Collect

Biometrics - Fingerprint data.

Worker Identifier – A unique number generated from the fingerprint data

Identifying information - Name and photograph.

Working hours information – Site entry/exit, worksite

Suspension expiry date

Training and qualifications

HSPS Passport usage information

## 2. Why Are We Processing Your Personal Data?

In order to comply with our legal obligations, in regards to the health and safety of workers on the High Speed Two Project and the construction of the project, HS2 Limited (HS2) and partner organisations have implemented the Health and Safety Passport System (HSPS) in order to ensure that policies relating to health and safety are applied across the entire project.

## 3. The lawful bases, under UK GDPR, that HS2 is relying on for processing this information are:

- a. We have a legal obligation
- b. There is a public interest
- c. There is a substantial public interest

## 4. Is There a Requirement to Supply HS2 the Personal Data?

In order for HS2 and other organisations to apply our policies across the whole project, certain information is required to be provided. Failure to provide this information may result in a loss of access to HS2 project sites.

## 5. Will the Personal Data Processing Be Subject to Any Form of Automated Decision Making?

No.

## 6. Who Do We Disclose Your Personal Data To?

Your information will be shared with HS2's partners organisations but only where strictly necessary, and only the minimum amount. Your information may be shared with other organisations where we have a legal obligation to do so.

## 7. Where Do We Process Your Personal Data?

All data is stored securely and processed within the UK.

## 8. How Long Will We Be Holding Your Personal Data For?

Your fingerprint information is only retained for as long as it takes to create a unique Worker Identifier number for you. At which point it is securely deleted. This process takes a few minutes.

Suspension data is only retained up to the expiry date of the suspension. At which point it is securely deleted.

All other information is stored securely in the UK for up to twelve (12) months after the date of your last use of the HSPS card, following which your information will be destroyed or securely anonymised.

## 9. The Source Of The Personal Data, And If Applicable, Whether It Came From Publicly Accessible Sources;

HSPS collects personal information either directly from you and your use of the HSPS card, or from your employer.

## 10. Where HS2 Intends To Further Process The Personal Data For A Purpose / Reason Other Than That For Which The Personal Data Were Collected.

In order to minimise health and safety risks during the lifetime of the project and improve health and safety practices within the construction industry, HS2 uses anonymised and aggregated data from the HSPS.

No information used in this activity can be traced back to any particular individual and does not constitute personal data.

## 11. Your Rights:

Under data protection law, you have rights including:

**Your right of access** - You have the right to ask us for copies of your personal information.

**Your right to rectification** - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

**Your right to erasure** - You have the right to ask us to erase your personal information in certain circumstances.

**Your right to restriction of processing** - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

**Your right to object to processing** - You have the the right to object to the processing of your personal information in certain circumstances.

**Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

If you would like to exercise any of the above rights you are invited to contact the HS2 Data Protection Officer, contact details for which are provided below.

If, however, you would like to lodge a complaint with the Information Commissioner's Office (ICO), you can register your complaint via the below contact methods:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF  
Email: <https://ico.org.uk/global/contact-us/email/>  
Helpline: 0303 123 1113

## 12. HS2 Data Protection Officer Details:

If you have any questions or queries regarding the way in which HS2 are processing personal data about you or the person(s) that you represent, you are invited to contact the HS2 Data Protection Officer on the details provided below:

Email: [HS2DataProtection@hs2.org.uk](mailto:HS2DataProtection@hs2.org.uk)

Mail:

Data Protection Officer,  
High Speed Two Ltd  
Two Snow Hill  
Queensway  
Birmingham  
B4 6GA  
Freephone: 08081 434 434  
Minicom: 08081 456 472