

LfD Lower Saxony supports companies in data protection-compliant implementation of the Corona Ordinance

## Notes on documentation

The Corona Ordinance of the State of Lower Saxony stipulates documentation requirements for numerous industries and institutions in order to be able to trace chains of infection. Many of those responsible do not know exactly how they can fulfill these obligations in accordance with data protection and therefore contact the State Commissioner for Data Protection (LfD) Lower Saxony. In addition, several affected parties have filed complaints because lists of customer data were more or less openly visible. In order to support the companies and institutions in the data protection-compliant implementation of the documentation obligations, the LfD Niedersachsen has published information and templates that are updated regularly.

“Until now, many companies have had nothing to do with this type of data processing. We cannot and do not want to leave them alone with these requirements,” says state data protection officer Barbara Thiel. This is also done in the interest of the customers affected by the documentation.

It is particularly important to ensure that no one can take note of the data of other people. The person responsible should therefore either request and enter the data themselves or use a single document for each customer or guest. In addition, the data may only be transmitted to the health department if they are requested by them. If this does not happen, according to the Corona Ordinance, they must be destroyed or deleted after one month at the latest.

"However, it is not enough to simply throw the lists in the waste paper," says Thiel. Instead, those responsible should shred the lists with a paper shredder. If the data was stored digitally, it must be erased using additional software that ensures irretrievable erasure. Under no circumstances may the data collected to fight the pandemic be used for other purposes such as advertising.

Another challenge for the companies is that the customers or participants have to be informed about the data collection according to Article 13 of the General Data Protection Regulation. This can be done, for example, by posting a notice in the reception area of the company. In order to make it easier for those responsible to fulfill this information obligation, the LfD Niedersachsen has created various templates, e.g. for hairdressers, fitness studios, restaurants, driving schools and other sectors.

The general notes on the documentation and the templates for fulfilling the information obligation can be accessed [here](#).

Press release as PDF