

PRIVACY STATEMENT

Registration for COVID 19 vaccination

1. INTRODUCTION

This Privacy Statement describes the measures taken to protect your personal data with regard to the action involving the present data processing operation and what rights you have as a data subject.

EDA protects the fundamental rights and freedoms of natural persons and in particular their right to privacy with respect to the processing of personal data (Article 1.1 of Regulation No 2018/1725).

2. CONTROLLER OF THE PROCESSING OPERATION

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General Secretariat of Council/Council Medical Service

Head of Sector ORG.1.E.S1

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3. PURPOSE OF THE PROCESSING

The purpose of the processing of personal and health-related data is to ensure that European Defence Agency (EDA) staff and their eligible family members are registered for vaccination against SARS-CoV-2 as part of the Belgian vaccination campaign, thereby alleviating some of the pressure on the Belgian health system.

The General Secretariat of the Council/Council Medical Service (hereinafter referred to as "GSC") has received formal authorisation from the Brussels authorities to set up a vaccination centre in order to ensure the health and well-being of its staff and business continuity.

The processing of personal and health-related data is necessary to carry out vaccination, and to establish priority groups and the necessary documentation in accordance with the Belgian plans. These data will be processed in order to:

- identify eligible persons who wish to be vaccinated at the GSC's COVID-19 vaccination centre;
- establish priority groups of « at-risk persons » as defined by the Superior Health Council in its '*Recommandations en matière de priorisation de sous-groupes de patients de moins de 65 ans pour la vaccination contre le SARS-COV-2 (Phase Ib)*'/'*Aanbevelingen voor het prioriteren van subgroepen van patiënten jonger dan 65 jaar voor vaccinatie tegen Sars-Cov-2 (Fase Ib)*' (CSS N° 9618/HGR Nr. 9618, February 2021);
- invite the individuals concerned to be vaccinated and communicate with them, including to invite individuals at very short notice with a view to making optimal use of the available doses – for this reason it is advisable to give private as well as professional contact details;
- follow up on the vaccination and any side-effects experienced at the vaccination centre.

The personal data necessary for the processing operation in question is collected by means of an email sent from the EDA HR unit to all staff and compiled in an excel table which is then sent to the Council Medical Service for integration into their system. The vaccination consent form and the medical declaration are collected manually when the vaccine is administered at the GSC vaccination centre.

Personal health-related data are processed only by the doctors and nurses of the GSC and by the administrative staff of the Healthcare and Social Services Unit tasked with managing the vaccination campaign. The doctors and nurses of the GSC are bound by professional secrecy on account of their duties. All members of the Healthcare and Social Services Unit sign a confidentiality clause.

4. DATA PROCESSED

Data processed are the following:

- surname, first name, personnel number, PerID (unique personal interinstitutional number), date of birth, Belgian social security identification number (NISS, which corresponds to the identification number in the Belgian national register), family relationship in the case of eligible family members;
- contact details: professional telephone number and email address, and private telephone number and email address;
- health-related data: if included in an “at-risk group” as defined by the Superior Health Council in its *‘Recommendations en matière de priorisation de sous-groupes de patients de moins de 65 ans pour la vaccination contre le SARS-COV-2 (Phase Ib)’/‘Aanbevelingen voor het prioriteren van subgroepen van patiënten jonger dan 65 jaar voor vaccinatie tegen Sars-Cov-2 (Fase Ib)’* (CSS N° 9618/HGR Nr. 9618, February 2021);
- vaccination consent form;
- medical declaration;
- type of vaccine;
- vaccination date;
- vaccination status (number of doses);
- any side effects experienced at the vaccination centre.

5. RECIPIENTS OF THE DATA

The recipients are:

EDA: HR unit and staff

GSC: Secretary-General, Director-General for Organisational Development and Services, Director of Human Resources, Head of the Healthcare and Social Services Unit for anonymised statistics from the ‘COVID-19 Vaccination’ application.

Belgian health authorities:

- last name, first name, date of birth, Belgian social security number;
- health-related data: if included in an “at-risk group” as defined by the Superior Health Council in its *‘Recommendations en matière de priorisation de sous-groupes de patients de moins de 65 ans pour la vaccination contre le SARS-COV-2 (Phase Ib)’/‘Aanbevelingen voor het prioriteren van subgroepen van patiënten jonger dan 65 jaar voor vaccinatie tegen Sars-Cov-2 (Fase Ib)’* (CSS N° 9618/HGR Nr. 9618, February 2021); type of vaccine, vaccination date, vaccination status (number of doses), any side effects experienced at the vaccination centre.

Transmission of the abovementioned data to the Belgian health authorities, which provide an equivalent level of protection under Regulation (EU) 2016/679 (GDPR), is necessary and proportionate in view of the intended purposes and meets the criteria of Article 9 of Regulation (EU) 2018/1725.

The data is transmitted in accordance with the Belgian national provisions on SARS-CoV-2 vaccination centres via the input of personal data into the national Vaccinnet platform selected by the Interministerial Committee for Public Health (CIM/IMC). The platform is used at national level in Belgium to record the administration of COVID-19 vaccines and report any side effects. These data can be transmitted only under the responsibility of a doctor from the Medical Service.

6. PROTECTION AND SAFEGUARDING OF THE DATA

All technical and organisational measures are taken to ensure the accuracy and relevance of the personal data held on the persons concerned and to ensure the protection of the data, so as to guarantee a level of security appropriate to the risks.

One or more of the following methods are used to ensure the secure processing of the personal and medical data:

- storage of paper files in secure offices or cupboards;
- storage in a secure archiving system;
- backup copies on computer disks in secure computer rooms.

Personal health-related data are processed only by the doctors and nurses of the GSC and by the administrative staff of the Healthcare and Social Services Unit tasked with managing the vaccination campaign. The doctors and nurses of the GSC are bound by professional secrecy on account of their duties.

All members of the Healthcare and Social Services Unit sign a confidentiality clause.

7. RIGHT OF ACCESS AND RECTIFICATION OF THE DATA

Data subjects have the right to access their personal data and the right to correct any inaccurate or incomplete personal data, as well as to request the removal of their personal data, which will be implemented within 15 working days after the request has been deemed legitimate.

If the data subject has any queries concerning the processing of his/her personal data, s/he may address them to the data controller at the following mailbox: HRAdmin@eda.europa.eu

Justified requests for blocking and erasure are treated within 15 working days after the request has been deemed legitimate.

8. TIME LIMIT FOR STORING DATA

The data collected by the 'COVID-19 Vaccination' application are deleted one year after the end of the vaccination campaign.

The data are kept by the Medical Service for the following periods:

- private contact details: one year following the end of the vaccination campaign.
- personal and health-related data of staff covered by the Staff Regulations: 30 years following termination of service.
- personal and health-related data of EDA trainees and SNEs, as well as spouses/partners and dependent children: 30 years following the end of the vaccination campaign.

Once the retention period has elapsed, all data will be destroyed.

9. LEGAL BASIS FOR THE PROCESSING OPERATION

The processing of personal data is carried out in accordance with:

- points (a) and (b) of Article 5(1) of Regulation (EU) 2018/1725;
- Article 7(2) and 103(2) of Council Decision (EU) 2016/135, setting out the requirement to ensure appropriate health and safety standards at work, which covers all EDA personnel regardless of status.

The processing of personal health-related data is carried out in accordance with:

- Article 7(2) and 103(2) of Council Decision (EU) 2016/1351
- points (b), (h) and (i) of Article 10(2) of Regulation (EU) 2018/1725.

Processing for the purposes provided for in point (h) of Article 10(2) of Regulation 2018/1725 is carried out only by the doctors and nurses of the GSC and by the administrative staff of the Healthcare and Social Services Unit tasked with managing the vaccination campaign. The doctors and nurses of the GSC are bound by professional secrecy on account of their duties. All members of the Healthcare and Social Services Unit sign a confidentiality clause.

- the Service Level Agreement (SLA) with the European Defence Agency (EDA) for the processing by the GSC of EDA personal data.
- Article 31 of Council Decision (CFSP) 2015/1835 of 12 October 2015 defining the statute, seat and operational rules of the European Defence Agency.

10. CONTACT DPO

You have the right to be informed and to access your personal data.

You also have the right to correct and complete your data.

Under certain circumstances, you may have the right to have your data deleted, to object to the processing of your personal data or to ask for such processing to be restricted.

In case you have any questions or queries concerning data protection at the European Defence Agency, you can also contact the Data Protection Officer at dataprotection@eda.europa.eu.

11. RECOURSE TO EDPS

As a data subject you have the right to have recourse at any time to the European Data Protection Supervisor (<http://www.edps.europa.eu>) at edps@edps.europa.eu.

Before you do so, it is recommended that you first try to obtain a remedy by contacting the person responsible for the handling of your personal data at the EDA and/or the Data Protection Officer.

12. ADDITIONAL INFORMATION

More information on Data Protection at the European Defence Agency can be obtained on our public website <https://www.eda.europa.eu/Aboutus/how-we-work/data-protection>.