

# **RIVM Privacy Statement**

24 May 2018

Privacy is about the right of all citizens and employees to protection of their private lives. The collection and exchange of data is vital to the realisation of our social purposes. The protection of personal data and lawful data processing are an essential part of that data exchange. Because the protection of personal data is important and substantially contributes to the realisation of our social purposes, RIVM highly values privacy: we process personal data lawfully, fairly and in a transparent manner, in accordance with laws and regulations.

RIVM uses data that persons share with us either directly or through professionals in the field; voluntarily, based on a legal obligation, or because - for example by way of scientific research or by keeping records - it is in the interest of our national and sometimes international public health and our living environment.

This privacy statement is to inform you how the Dutch National Institute for Public Health and the Environment (RIVM) handles your personal data.

This statement is comprised of several sections:

- What is personal data?
- For what purposes does RIVM process your personal data?
- How do we handle your personal data?
- When is your data shared?
- Scientific research

We will review this privacy statement on a regular basis.

## What is personal data?

Personal data is information which relates directly to a natural person or information which can be traced to such person. Examples of personal data are a home address, telephone number and/or e-mail address.

### Special personal data

Some personal data is more sensitive, because their processing may highly impact a person's life. Examples of special personal data are data revealing a person's ethnic origin, religious beliefs or health. The law provides additional protection for this type of personal data. Personal data of children are always sensitive and, consequently, always enjoy additional protection.

For more information on personal data, please refer to the <u>website of the Dutch Data Protection</u> <u>Authority.</u>

## For what purposes does RIVM process your personal data?

Retrieval, consultation, maintenance and disclosure of personal data occur in many places within RIVM. Examples of this include:

- conducting scientific (healthcare) research;
- carrying out the National Immunisation Programme;
- and in the context of our central role in infectious disease control;
- in national prevention and screening programmes.

## How do we handle your personal data?

RIVM bases its processing of personal data on a number of principles and takes measures to ensure reliable and careful handling of personal data.

### Data Protection Officer

The Dutch Ministry of Health, Welfare and Sport, of which RIVM is a division, has appointed a Data Protection Officer (DPO). The DPO is independent and acts as the internal supervisor, including for RIVM. The DPO verifies whether the Ministry applies and complies with the rules of the General Data Protection Regulation (GDPR) and the Dutch GDPR Implementation Act. The <a href="Dutch Data">Dutch Data</a> Protection Authority is the external supervisory authority that monitors application of -and compliance with- privacy legislation.

## **Principles**

### Legal basis

RIVM processes personal data if there is a legal basis to do so, for example, consent. In that respect, we ensure that personal data is processed solely for the specific purpose for which they were collected.

#### Data minimisation

RIVM does not process any more personal data than necessary. Wherever possible, we process fewer personal data or none at all.

# Minimisation of privacy breach

RIVM ensures that the breach of a person's privacy does not outweigh the purpose served by the collection of the data. In that respect, we opt for the form of processing of personal data that will least breach your privacy if there is a choice between various personal data to realise the same purpose.

# Retention for as long as necessary

We at RIVM retain your personal data:

- for as long as they are needed for the purpose for which they were collected;
- as required pursuant to the Dutch Public Records Act; and
- no longer than permitted by law.

## Measures

Reliability, integrity and confidentiality

RIVM takes measures to ensure reliable, fair and careful handling of personal data:

- Personal data is treated confidentially. That means that RIVM ensures that only persons with the right authorisations can process your data, subject to a confidentiality obligation.
- Personal data is appropriately secured. In that respect, we comply with the information security instructions and standards of the Government of the Netherlands.
- RIVM makes arrangements with external parties, such as software suppliers and data centres, regarding the handling of your personal data, and monitors whether external parties comply with those arrangements.

### When are your data shared?

The performance of the legal tasks/tasks in the public interest may entail RIVM's sharing personal data with other organisations, such as a ministry, a university or a hospital. Such sharing will at all times be subject to a valid legal basis. Furthermore, arrangements will be made and appropriate measures taken to ensure reliable, fair and careful sharing of the personal data. This will also apply in the event of transfer of personal data to other countries. In no event will personal data be provided to third parties for commercial purposes.

### Scientific research

RIVM conducts a great deal of scientific research. Wherever possible, we try to do so using anonymous data. Should it be necessary to process non-anonymous data, i.e. personal data, we will seek the data subject's consent. In all situations, we will minimise the processing of identifiable personal data and ensure that the results of the research can no longer be traced to individuals.

# Contact about your rights

You have a number of rights, including the right of access and the right to rectification. If you wish to know what personal data we process about you, you may submit a request for access. RIVM will handle your request within 1 month.

Please do not forget to identify yourself.

If you invoke one or more of your privacy rights, please remember to attach an identity document. Examples of valid identity documents are a passport or driving licence. You may use the KopieID app to make a safe copy of your identity document on your smartphone. The app was created by the Ministry of the Interior and Kingdom Relations. Read how you can download the KopieID app.

If you require access to special personal data, criminal data or data of minors, we request you to identify yourself in person when you collect the data from us, so that we are certain that we provide the information to the right person.

There are two ways for you to submit your request to us: digitally: Send an e-mail to: AVG-RIVM@rivm.nl

In writing [please do not forget to sign your letter]:

RIVM For the attention of GDPR Freepost number 3270 3720 VB Bilthoven

If your data proves to be incorrect, incomplete or irrelevant, you may submit an additional request for rectification or completion of your data.

If you have any questions about the GDPR or if you wish to file a complaint, please contact the <u>Dutch Data Protection Authority.</u>