

10.01.2022

# Privacy Statement

## Vaccine effectiveness related studies

This processing operation is subject to Regulation (EU) 2018/1725 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data<sup>1</sup>. The information in this communication is given pursuant to Articles 15 and 16 of this Regulation.

### 1. PURPOSE OF THE PROCESSING OPERATION

ECDC processes the personal data collected in accordance with Regulation (EU) 2018/1725. The purpose of the processing is to collect data which will allow evaluation of the effect of the COVID-19 vaccines and the impact of vaccination programmes. Any personal data collected by ECDC shall be processed solely for the performance, management and follow-up of these ECDC activities and for no other purpose.

### 2. IDENTITY OF THE DATA CONTROLLER

The data controller is the European Centre for Disease Prevention and Control (ECDC), Gustav III:S Boulevard 40, 16973 Solna, Sweden.

You can contact the controller by email at [karl.ekdahl@ecdc.europa.eu](mailto:karl.ekdahl@ecdc.europa.eu)

Please note that ECDC as the main controller is responsible for processing your requests for exercising the rights of data subjects under Regulation (EU) 2018/1725 and providing you with information about the data processing operation.

### 3. LEGAL BASIS FOR THE PROCESSING

The legal basis of the processing operation is Article 5 (1) (a): the processing is necessary for performance of tasks in the public interest attributed by Union or Member State legislation, and in particular:

Paragraph 10 and 11 Council's recommendation 2018/C 466/01;

ECDC Single Programming Document 2021-23, page 20

ECDC Founding Regulation 861/2004

Processing of health data is allowed in accordance to Article 10 (2) (h) of Regulation (EU) 2018/1725.

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<sup>1</sup> [OJ L 295, 21.11.2018, p. 39–98](#)

#### 4. CATEGORIES OF PERSONAL DATA COLLECTED

The categories of data collected and used for the processing operations are the following:

Social and demographic data:

Gender  
Country of Birth  
Country of Residence  
Work Position/Occupation  
Educational Background

Health Data:

Pre-existing medical conditions, previous infections, medications, pregnancy, smoking history, alcohol use, socioeconomic status and ethnicity. Patient Data: Vaccination Status, laboratory Results

The provision of the personal data is not mandatory. The processing of your data will not be used for an automated decision making, including profiling.

#### 5. WHO HAS ACCESS TO YOUR INFORMATION AND TO WHOM IS IT DISCLOSED?

Data will be processed on behalf of ECDC by EpiConcept Société par actions simplifiée (SAS) seated in Paris, France. Epiconcept is certified Health Data Host and may engage sub-processors to process the data.

Besides of the ECDC contractor acting as processor (and any sub-processor), the recipients of the data are selected ECDC staff within the DPR and PHF unit of ECDC. Aggregated and anonymised data will be published

Pseudonymised case-based data can be shared with international organizations/entities or other third parties (also outside of the EU) if requested via the TESSy access policy.

#### 6. HOW LONG DO WE KEEP YOUR DATA?

The processor (EpiConcept) and any sub-processor will retain the personal data as long as necessary for the execution of the contract.

ECDC will retain the personal data for 10 years since the collection.

#### 7. HOW DO WE PROTECT AND SAFEGUARD YOUR INFORMATION?

In order to protect your personal data, a number of technical and organisational measures have been put in place. Technical measures include appropriate actions to address online security, risk of data loss, alteration of data or unauthorised access, taking into consideration the risk presented by the processing and the nature of the data being processed. Organisational measures include restricting access to the data to authorised persons with a legitimate need to know for the purposes of this processing operation.

EpiConcept has an IT- service tool hosting, backup and maintenance of the solution. EpiConcept is ISO 27001 certified for Health data hosting. EpiConcept has a proper IT Security Risk Management framework in place and will properly maintain the framework and manage the risks for the duration of the Contract between ECDC and EpiConcept.

#### 8. WHAT ARE YOUR RIGHTS AND HOW YOU CAN EXERCISE THEM?

The Controller may be contacted at any time by the data subjects for exercising the right of access, to rectify, to block, to erase, to transmit or to object to the processing of the data. Where the legal basis to the processing is consent, this consent can be withdrawn at any time. The Controller can be contacted on: [karl.ekdahl@ecdc.europa.eu](mailto:karl.ekdahl@ecdc.europa.eu) Data subjects can request the deletion of their personal data by the data controller, who will do so within 45 working days.

Data subjects can also contact the ECDC Data Protection Officer (DPO) in case of any difficulties or for any questions relating to the processing of their personal data at the following email address: [dpo@ecdc.europa.eu](mailto:dpo@ecdc.europa.eu). The data subject has the right of recourse at any time to the European Data Protection Supervisor: [www.edps.europa.eu](http://www.edps.europa.eu) and at [edps@edps.europa.eu](mailto:edps@edps.europa.eu)

Exceptions based on Regulation (EU) 2018/1725 may apply.