

PROCESSING OF YOUR PERSONAL DATA

Consent to the collection of your personal data by the European Commission and to the transmission of your personal data to the relevant Italian Health Authorities

Your personal data is collected and transmitted to the relevant Sistema Tessera Sanitaria (Sistema TS) which falls under the responsibility of the Ministry of Economy and Finance, for the purpose of ensuring that you will be included in the national vaccination campaign against COVID-19. See the relevant privacy statement below.

The list of personal data categories that will be collected and transmitted to the Italian authorities is the following:

- Identification: first name, last name, type of identity document, identity document number, issuing and expiration date, fiscal code number;
- Contact details: email address, phone number;
- Demographics: birth date, gender, country of birth, place and province of birth (only in Italy), foreign country of residence, region code of domicile, city of domicile;
- Former job related details: location/institution, email of the institution, phone number of the institution.

These data are transmitted to the Sistema Tessera Sanitaria (Sistema TS), which is responsible for the National Health scheme management in Italy. This will allow you to be included in the Covid-19 regional vaccination campaigns and will be necessary both for giving you access to the current campaign and for future developments, such as other Covid-19 related initiatives.

Pursuant to Article 5(1)(d) and Article 7 of [Regulation \(EU\) 2018/1725](#)¹, you hereby declare to freely give your consent to the collection and transmission of your personal data by the European Commission to the Italian authorities by signing this consent form.

You can withdraw your consent at any time, without compromising the lawfulness of the processing based on the consent given before that withdrawal, by writing to this email address: HR-ISP-Medical-Service@ec.europa.eu.

The Data Protection Officer (DPO) of the Commission can be contacted at: DATA-PROTECTION-OFFICER@ec.europa.eu

Complaints should be addressed to the European Data Protection Supervisor (EDPS): edps@edps.europa.eu

Date:

First name and surname:

Signature:

¹ Regulation (EU) 2018/1725 of the European Parliament and of the Council of 23 October 2018, on the protection of natural persons with regard to the processing of personal data by the EU institutions, bodies, offices and agencies and on the free movement of such data, OJ L 295, 21.11.2018, p. 39–98.

PRIVACY STATEMENT

PROTECTION OF YOUR PERSONAL DATA

This privacy statement provides information about the processing and the protection of your personal data.

Processing operation: Transmission of personal data to the Italian Health Authorities in the context of the Covid-19 vaccination campaign.

Data Controller: *DG HR.D.5*

Record reference: *DPR-EC-09708.3*

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1. Introduction

The European Commission (hereafter ‘the Commission’) is committed to protecting your personal data and to respecting your privacy. The Commission collects and further processes personal data pursuant to [Regulation \(EU\) 2018/1725](#) of the European Parliament and of the Council of 23 October 2018 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 (repealing Regulation (EC) No 45/2001).

This privacy statement explains the reason for the processing of your personal data, the way we collect, handle and ensure the protection of all personal data provided, how that information is used and what rights you have in relation to your personal data. It also specifies the contact details of the responsible Data Controller with whom you may exercise your rights, the Data Protection Officer and the European Data Protection Supervisor.

The information in relation to the processing operation “*Transmission of personal data to the Italian health authorities in the context of Covid-19 vaccination campaign*” undertaken by DG HR.D.5 is presented below.

2. Why and how do we process your personal data?

Purpose of the processing operation: DG HR.D.5 collects and uses your personal information to implement the vaccination plans in the context of COVID-19.

In the context of vaccination against COVID-19, in Italy the implementation of the vaccination plans are under the responsibility of the National Health Authorities (Ministero della Salute). In particular, by Ordinance N.7/2021, the Italian authorities have announced that all people belonging to EU Institutions, including active/retired staff and their dependents, residing on the Italian territory and regardless of the registration in the Italian Health System, will be included in the national vaccination campaign.

With a view to ensure that all Commission staff, pensioners and their family members, residing on the Italian territory, covered by the JSIS scheme and not registered in the Italian Health System, are included in the Covid-19 vaccination campaign it is indispensable to provide their identification and contact data to the National Health Service. This also refers to Seconded National Experts, trainees and intra-muros service providers, even though they are not covered by the JSIS, and in case they want to participate in this Covid-19 vaccination campaign. Are also included: former Contract Agents/Temporary Agents who are unemployed and still covered by the JSIS.

Data transmission must be carried out in accordance with a normalized format, so that importation can be carried out successfully without manual intervention. Based on the Commission Decision C(2021)1558 of 5.03.2021 on the transmission of personal data of Commission staff, pensioners and their family members to the national health authorities in the framework of the vaccination against COVID-19, and on specific consent by the data subjects, the Commission will offer to staff based in Italy (including pensioners and family members) the possibility to introduce - through the SSNCovid web form - their data in a file for subsequent transmission to the Italian Health Ministry (Sistema TS) as well as to local related health authorities.

Periodically, the Ispra Medical Service exports new and modified records from SSN Covid web portal and transfers them to the relevant health authorities using a secure protocol.

The Italian Health Ministry will generate a personal TS Identification number that will be therefore communicated by the Ispra Medical Service to the data subjects.

Your personal data will not be used for an automated decision-making including profiling.

3. On what legal ground(s) do we process your personal data?

The basis for the processing has been laid down in the Commission Decision (C/2021/1558) of 5.03.2021 on transmission of personal data of Commission staff, pensioners and their family members to the national health authorities in the framework of the vaccination against COVID-19 and in the national rules regarding vaccination campaigns, and in the [Italian Ordinanza 07/2021](#).

We also process your personal data because according to Regulation (EU)2018/1725 Art. 5:

- (a) processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Union institution or body;

- (d) the data subject has given consent to the processing of his or her personal data for one or more specific purposes;
- (e) processing is necessary in order to protect the vital interests of the data subject or of another natural person.

We do not process any special categories of personal data, therefore Article 10 of Regulation (EU) 2018/1725 does not apply.

4. Which personal data do we collect and further process?

In order to carry out this processing operation DG HR.D.5 collects the following categories of personal data:

- Identification: first name, last name, type of identity document, identity document number, issuing and expiration date, fiscal code number;
- Contact details: email address, phone number;
- Demographics: birth date, gender, country of birth, place and province of birth (only in Italy), foreign country of residence, dependent family members, region code of domicile, city of domicile;
- Job related details: location/institution, email of the institution, phone number of the institution.

Additionally, the system processes the authentication data provided by EU Login, in particular: username and per id for active staff and email address for non-active staff.

The provision of personal data is not mandatory.

5. How long do we keep your personal data?

DG HR.D.5 will only keep your personal data for the time necessary to fulfil the purpose of collection or further processing, namely for the duration of the vaccination campaign in Italy, to allow the registration of newcomers and the correction of existing records.

The exact duration of the vaccination campaign is uncertain so it is not possible to establish a precise period. Therefore, the data will be stored for 24 months starting from the date on which the data are collected. In any case, as soon as the vaccination campaign ends, and successful transmission of the data to Sistema TS confirmed for all data subjects involved, there is no need to archive or keep the data any longer and they will be permanently erased. Before the end of the retention period, data subjects will have the possibility to request at any time that their data be removed from the database.

6. How do we protect and safeguard your personal data?

All personal data in electronic format (e-mails, documents, databases, uploaded batches of data, etc.) are stored on the servers of the European Commission. All processing operations are carried out pursuant to the [Commission Decision \(EU, Euratom\) 2017/46](#) of 10 January 2017 on the security of communication and information systems in the European Commission.

In order to protect your personal data, the Commission has put in place a number of technical and organisational measures 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 personal data being processed. Organisational measures include restricting access to the personal data solely to authorised persons with a legitimate need to know for the purposes of this processing operation.

7. Who has access to your personal data and to whom is it disclosed?

Access to your personal data is provided to the Commission staff responsible for carrying out this processing operation and to authorised staff according to the “need to know” principle: system administrators at the JRC Ispra IT service (only for error management). Such staff abide by statutory, and when required, additional confidentiality agreements.

Your data will be transferred only to the Italian Health Authorities. Once the vaccination campaign will end, and the last transmission to the Italian Health Authorities is completed, there is no need to archive or keep the data and will be erased.

8. What are your rights and how can you exercise them?

You have specific rights as a ‘data subject’ under Chapter III (Articles 14-25) of Regulation (EU) 2018/1725, in particular the right to access, rectify or erase your personal data and the right to restrict the processing of your personal data. Where applicable, you also have the right to object to the processing or the right to data portability.

You have consented to provide your personal data to DG HR.D.5 for the present processing operation. You can withdraw your consent at any time by notifying the Data Controller. The withdrawal will not affect the lawfulness of the processing carried out before you have withdrawn the consent.

You can exercise your rights by contacting the Data Controller, or in case of conflict the Data Protection Officer. If necessary, you can also address the European Data Protection Supervisor. Their contact information is given under Heading 9 below.

Where you wish to exercise your rights in the context of one or several specific processing operations, please provide their description (i.e. their Record reference(s) as specified under Heading 10 below) in your request.

9. Contact information

- The Data Controller

If you would like to exercise your rights under Regulation (EU) 2018/1725, or if you have comments, questions or concerns, or if you would like to submit a complaint regarding the collection and use of your personal data, please feel free to contact the Data Controller, HR-DATA-PROTECTION-COORDINATOR@ec.europa.eu .

- The Data Protection Officer (DPO) of the Commission

You may contact the Data Protection Officer (DATA-PROTECTION-OFFICER@ec.europa.eu) with regard to issues related to the processing of your personal data under Regulation (EU)

2018/1725.

- **The European Data Protection Supervisor (EDPS)**

You have the right to have recourse (i.e. you can lodge a complaint) to the European Data Protection Supervisor (edps@edps.europa.eu) if you consider that your rights under Regulation (EU) 2018/1725 have been infringed as a result of the processing of your personal data by the Data Controller.

10. Where to find more detailed information?

The Commission Data Protection Officer (DPO) publishes the register of all processing operations on personal data by the Commission, which have been documented and notified to him. You may access the register via the following link: <http://ec.europa.eu/dpo-register>.

This specific processing operation has been included in the DPO's public register with the following Record reference: DPR-EC-09708.3: Transmission of personal data to the Italian health authorities in the context of Covid-19 vaccination campaign.