



## **RIVM privacy statement for monkeypox vaccination programme**

### **General**

The Netherlands has launched a vaccination programme to vaccinate specific risk groups against the monkeypox virus. The National Institute for Public Health and the Environment (RIVM) is coordinating this programme under the responsibility of the Ministry of Health, Welfare and Sport (VWS).

RIVM processes personal data to ensure proper management of the vaccination programme. This privacy statement explains which data will be processed by RIVM and why, and what rights you have when RIVM processes your data.

### **Where does the data come from?**

RIVM is not the implementing party in the vaccination programme; that role has been assigned to care providers, in this case the Municipal Public Health Services (GGDs). If you are in one of the risk groups, then you will receive an invitation from your care provider. The care provider will administer the vaccination(s) and record your details in their medical files.

During your vaccination appointment, you will be asked if you consent for your data to be shared with RIVM. You will be asked to sign a form stating whether or not you agree to this. Even if you do not want RIVM to receive your data, you can still be vaccinated. In that case, RIVM will not receive any of your personal data.

### **What data does RIVM receive and use?**

- Patient number assigned by your care provider (in this case the GGD)
- Year of birth
- Gender
- Postcode (first 4 numbers)
- Whether or not you have a Citizen Service Number
- Reason you were invited to receive the vaccination, i.e. which risk group you are in  
(this often includes data on HIV status, PrEP use, sexual health and/or sexuality)
- Date and location of your vaccination(s)
- Batch number of the vaccine
- Whether you had contact with someone infected with monkeypox
- Whether you had a smallpox vaccination in your childhood
- Whether you have problems with your immune system

### **Important: some information is NOT shared with RIVM. Only your care provider has access to the following data:**

- Citizen service number (BSN)
- Name
- Street name and house number
- Telephone number
- E-mail address

RIVM

A. van Leeuwenhoeklaan 9  
3721 MA Bilthoven (NL)  
PO Box 1  
3720 BA Bilthoven (NL)  
[www.rivm.nl/en](http://www.rivm.nl/en)

T +31 (0)88 689 91 11

**Date:**  
25 August 2022

## **For what purposes does RIVM process my personal data?**

Your data will be used for the purpose of:

- safety monitoring,
- efforts to control monkeypox,
- research on the efficacy of the vaccine,
- monitoring & evaluation of the vaccination programme, and
- scientific research.

## **What does the law say about the use of my data?**

The General Data Protection Regulation (GDPR) (<https://business.gov.nl/regulation/protection-personal-data/>) states when it is permitted to use personal data and special categories of personal data (in this case, data about your health and your sexuality). The Medical Treatments Contract Act (*Wet op de geneeskundige behandelovereenkomst*, WGBO) states that your care provider must ask you for consent to share your personal data with RIVM. You can still be vaccinated even if you do not grant this permission. In that case, RIVM will not receive any of your personal data.

RIVM is permitted to process your data on the basis of its public task regarding research, prevention and control of infectious diseases.

## **How long will my data be retained?**

RIVM will not retain your data any longer than necessary. In principle, your data will be retained for 20 years. This is in line with the statutory time period established in the Medical Treatments Contracts Act (WGBO). RIVM may retain the data for shorter or longer if necessary for the purposes described above.

## **With whom will my data be shared?**

Data will be processed in such a way that it can never be traced back to individual persons in the event of publication or provision to third parties.

Your data may be processed in reports provided to the Ministry of Health, Welfare and Sport (VWS). Reports may also be published, for example on the RIVM website. These reports only contain aggregated data (key figures) and cannot be traced back to individual persons.

Your data may be used for scientific research, which is one of the public tasks assigned to RIVM. If that happens, your data will then be pseudonymised as described in the Public Health Act (*Wet publieke gezondheid*). This means that your data will be replaced by a code. Data in scientific publications can never be traced back to individual persons.

## **Where will my data be processed?**

Your data will be stored and processed exclusively in the Netherlands, and specifically in the national government's data centre in Amsterdam.

## **Will there be profiling on the basis of my data?**

There is no profiling involved in the monkeypox vaccination programme. Profiling is the automated analysis of large volumes of personal data, which are then grouped into categories (profiles), for potential use in making automated individual decisions.

## **What are my rights?**

If you give consent for your data to be used, you can also withdraw your consent. You also have a number of other rights, such as the right to view or correct your data or to have it deleted.

If you would like to exercise your rights, please follow the procedure set out in the [general privacy statement provided by RIVM](#).

Please note that the option to withdraw your consent or exercise your other rights is only available in practice if RIVM can trace the data back to you. In the context of this data processing, RIVM does not record any data that can be used to directly identify you. If you contact RIVM for the purpose of withdrawing your consent or exercising your other rights, RIVM cannot take action in response to your request if it is not possible to match you with the data being processed by RIVM.

## **Who is the Data Protection Officer?**

The Ministry of Health, Welfare and Sport (VWS) has appointed a Data Protection Officer (DPO). The DPO is independent and acts as the internal supervisor. The scope of this monitoring includes RIVM, which is part of the ministry. The DPO verifies whether the Ministry applies and complies with the rules of the applicable laws. You can contact the DPO by sending an e-mail to [FG-VWS@minvws.nl](mailto:FG-VWS@minvws.nl).

## **How can I submit a complaint?**

What actions can you take? If you object to the way in which RIVM processes your data for the monkeypox vaccination programme, you can submit a complaint to:

- RIVM. See: <https://www.rivm.nl/en/complaints>
- the Data Protection Officer (DPO). E-mail address: [FG-VWS@minvws.nl](mailto:FG-VWS@minvws.nl)
- the Dutch Data Protection Authority. See: <https://autoriteitpersoonsgegevens.nl/nl/zelf-doen/gebruik-uw-privacyrechten/klacht-melden-bij-de-ap>.

## **Changes to the privacy statement**

This privacy statement is subject to change. In the event of any changes, the updated privacy statement will be published online at <https://www.rivm.nl/en/monkeypox>.

Version 4.0 24-8-2022