



Privacy Statement: COVID-19 vaccination programme

General

In early 2021, the Netherlands launched a vaccination programme against COVID-19. This programme is conducted under the responsibility of the Ministry of Health, Welfare and Sport (VWS). Important elements of the programme include organising the implementation, keeping records, and monitoring the safety and effectiveness of the vaccination programme. This sometimes also involves the use of personal data.

In this privacy statement, we explain how personal data is processed. This is primarily because we consider it important to inform you, and because you are legally entitled to clear and transparent information about how we are using your data and why.

In this privacy statement, we answer the following questions:

1. What information does RIVM register and where does it come from?
2. Why does RIVM register personal data?
3. What does the law say about the use of my data?
4. How long will my data be retained?
5. With whom will my data be shared?
6. Where will my data be processed?
7. Will there be profiling on the basis of my data?
8. What are my rights?
9. Who is the Data Protection Officer?
10. How can I submit a complaint?
11. Privacy Statement of the Municipal Public Health Service (GGD)

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1. What information does RIVM register and where does it come from?

- a. Your **personal data**. This category of data is obtained from one of the following sources:
 - the Personal Records Database (BRP);
 - the Register of Non-Residents (RNI) with a residence address in the Netherlands registered in the BRP;
 - the personal records database of the Ministry of Foreign Affairs (PROBAS);
 - the records of the Central Agency for the Reception of Asylum Seekers (COA).

This may include your personal data such as your name, address, city/town of residence, date of birth, country of birth, gender, citizen service number (BSN), and any titles you may have (including titles of nobility).

- b. Your **vaccination data**. This category of data is obtained from the healthcare provider that gave you a vaccination, such as your GP, an institutional physician or the Municipal Public Health Services (GGDs).

It includes the following data:

- The organisation and healthcare provider that gave you the vaccination;
- Date and location of the COVID-19 vaccination(s);
- For boosters and repeat vaccination(s): the number of the vaccination (how many booster doses received so far);
- Manufacturer of the vaccine and batch ID of the vaccine given to you.

When you are invited to receive the vaccination, you will also be asked for permission to allow RIVM to register your personal vaccination data. You can still be vaccinated even if you do not give permission. In that case, RIVM will receive anonymised vaccination data that cannot be traced back to you.

2. Why does RIVM register personal data?

RIVM needs personal data and vaccination data to continuously monitor the effect of the vaccination programme. Based on these reports, RIVM can:

- send invitations and reminders for vaccinations;
- keep track of how many people in the Netherlands have been vaccinated;
- assess the efficacy and safety of the vaccines;
- take immediate steps in the event of severe side-effects or other problems.

Whenever there is an outbreak of an infectious disease, it is very important to know how many people are already protected by vaccination. With that knowledge, RIVM can determine the risk that unvaccinated people will become ill and whether the government needs to implement special measures.

3. What does the law say about the use of my data?

The legal basis for the use of personal data is established in the European General Data Protection Regulation (GDPR), which is implemented in national law in the Netherlands in the Dutch GDPR Implementation Act (*Uitvoeringswet Algemene Verordening gegevensbescherming*). (See also <https://business.gov.nl/regulation/protection-personal-data/>) The GDPR states when the use of personal data and special categories of personal data (in this case, your vaccination data) is permitted.

The Medical Treatment Contracts Act (*Wet op de geneeskundige behandelingsovereenkomsten* - WGBO) states that vaccination data is a data category

that must be stored in your medical records by a healthcare provider. The care professional may only provide your vaccination data to RIVM if you give consent. For that reason, your care professional or healthcare provider must ask you for **permission** to share your personal vaccination data with RIVM. You can still be vaccinated even if you do not give permission. In that case, RIVM will receive anonymised vaccination data.

RIVM has the legally mandated task of providing management and guidance for a national vaccination programme. Vaccinations against COVID-19 are part of this vaccination programme. That includes processing vaccination data. With your permission, RIVM therefore processes your vaccination data.

An **authorisation decision** of the Ministry of the Interior and Kingdom Relations stipulates that RIVM is permitted to receive data on private citizens from the Personal Records Database (BRP) and the Register of Non-Residents (RNI). Approval is not required for obtaining data from the BRP (see: <https://www.government.nl/topics/personal-data/personal-records-database-brp>).

The General Provisions on the Citizen Service Number Act ([Wet algemene bepalingen personenservicenummer](#)) states when your citizen service number may be used. This is permitted, for example, if the requester has a public task.

4. How long will my data be retained?

Your personal data and your vaccination data will be retained in the registration system for 20 years. This is in line with the data retention period specified in the Medical Treatment Contracts Act (*Wet op de geneeskundige behandelingsovereenkomsten* – WGBO).

5. With whom will my data be shared?

The Pharmacovigilance Centre Lareb is monitoring the programme closely for side-effects from the vaccinations. If anyone reports any side-effect, Lareb may, with the permission of the reporting party, request data from RIVM. In that case, the following data will be requested:

- Vaccination data;
- Citizen service number (BSN);
- Name and address;
- Date of birth;
- Gender.

Your data will be shared with the Ministry of Health, Welfare and Sport (VWS) if you opt to enter vaccination data in the CoronaCheck app.

More information: [Using proof of vaccination to generate a COVID Certificate | Government.nl](#).

Based on the data that you shared, RIVM can send you an invitation with an appointment for a repeat vaccination against COVID-19. To do so, your personal data needs to be sent to the Municipal Public Health Services (GGDs). This data exchange is based on the Citizen service number (BSN). This makes it possible for the GGD to schedule an appointment for you at a location based on your registered address. RIVM only receives the appointment details from the GGD in order to include them in your invitation letter. RIVM does not receive any other data from the GGD. For more information about how the GGD processes personal data, see item 11 below.

Data from the vaccination programme may at some point in the future be used for scientific research in the field of epidemiology, which is one of the mandated tasks assigned to RIVM. If that happens, your data will be *pseudonimised* as described in the Public Health Act (*Wet Publieke Gezondheid*)¹. This means that your data will be replaced by a code. If non-encoded data is needed for a specific research purpose, the researchers would have to request your permission first.

6. Where will my data be processed?

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

7. Will there be profiling on the basis of my data?

There is no profiling involved in the COVID-19 vaccination programme. Profiling is the automated analysis of large volumes of personal data in order to group it into categories (profiles). Based on these profiles, it would be possible to make individual decisions on an automated basis.

8. What are my rights?

You have various rights, such as the right to inspect, delete or edit your data. [More information about your data rights and how to exercise them is available here.](#)

Your data may at some point be pseudonimised for scientific research in the field of epidemiology (see item 5). If that happens, there will not be any personal data that can be used to identify you directly, so you will be unable to invoke certain rights under the GDPR.

9. Who is the Data Protection Officer?

The Ministry of Health, Welfare and Sport has appointed a Data Protection Officer (DPA). The DPA is independent and functions as an internal monitor. The scope of this monitoring includes RIVM, which is part of the Ministry. The DPA checks whether the Ministry is applying and complying with the rules set out in the law.

You can contact the Data Protection Officer by sending an e-mail to FG-VWS@minvws.nl.

10. What should I do if I have a complaint?

If you object to the way in which RIVM processes your data for the COVID-19 vaccination programme, you can submit a complaint to:

- RIVM. See: <https://www.rivm.nl/en/complaints>
- The Data Protection Officer. E-mail: FG-VWS@minvws.nl
- The Dutch Data Protection Authority. See: <https://autoriteitpersoonsgegevens.nl/nl/zelfdoen/privacyrechten/klacht-indienen-bij-de-ap>.

11. Privacy Statement of the Municipal Public Health Service (GGD)

The national umbrella organisation of the Municipal Public Health Services (GGD) and Regional Medical Assistance Organisations (GHOR) is *GGD GHOR Nederland*. As the implementing organisation for the vaccinations against COVID-19, GGD GHOR processes data from the GGDs.

¹ Article 6b and 6c(3), Public Health Act

If you would like more information about how your data is processed by GGD GHOR, see the privacy statement on coronavirus vaccination provided by GGD GHOR: [Privacy statement on coronavirus vaccination | GGD GHOR Nederland](#)

For an overview of all the privacy statements of the Municipal Public Health Services (GGDs), see [Privacy Statements | GGD GHOR Nederland](#).