



RIVM privacy statement regarding the mpox vaccination programme

RIVM

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General

The Netherlands has launched a vaccination programme to vaccinate specific at-risk groups against the monkeypox virus, which causes the disease mpox (formerly known as monkeypox). The programme is supervised by RIVM under the responsibility of the Ministry of Health, Welfare and Sport (VWS).

In order to supervise the vaccination programme properly, RIVM uses personal data. In this statement, we explain what data RIVM uses and why, and the rights you have when RIVM uses your data.

Where does the data come from?

RIVM does not implement the programme itself: this is left up to care providers – in this case, the Municipal Public Health Services (GGDs). If you belong to one of the at-risk groups, you will receive an invitation from your care provider. The care provider will administer the vaccination(s) and record your data in its medical record.

During your vaccination appointment, you will be asked if you consent to your data being shared with RIVM. To that end, you will sign a statement indicating whether you consent to this or not. If you do not want RIVM to receive your data, you can still get your vaccination as normal. In that case, RIVM will receive anonymous vaccination data that cannot be traced back to you.

What data will RIVM receive and use?

If you do not consent to your data being shared, RIVM will receive the following anonymous data:

- Week number and location (GGD) of the vaccination(s)
- Whether you were vaccinated against smallpox during childhood
- Whether you were vaccinated following contact with someone who was infected with mpox

If you do consent to your data being shared, RIVM will receive the following data, which will be processed (pseudonymised) in such a way that it cannot be traced back to you directly.

- Patient number with your care provider (in this case, the GGD)
- Year of birth
- Sex
- Postcode (the four digits only)
- Whether you have a citizen service number (yes/no)
- The at-risk group to which you belong (including health data related to your sexual orientation and/or behaviour)
- Date and location (GGD) of your vaccination(s)
- Vaccine batch number
- Whether you were vaccinated following contact with someone who was infected with mpox
- Whether you were vaccinated against smallpox during childhood
- Whether there are issues with your immune system

It may be useful to know that the following data will NOT be shared with RIVM and will be known only to your care provider:

- Citizen service number
- Name
- Street name and house number
- Telephone number
- Email address

What will RIVM use your data for?

We will use your data for:

- safety monitoring;
- combating mpox;
- research on vaccine efficacy;
- monitoring and evaluation of the vaccination programme; and
- scientific research.

May we use your personal data?

RIVM is only allowed to use personal data if there is a valid processing ground under the GDPR. In addition, the GGD will enter into a treatment agreement with you, making it subject to the Dutch Medical Treatment Contracts Act. This stipulates that the GGD has to ask your consent to share your data with RIVM. If you do not give your consent, you can still get vaccinated. In that case, RIVM will receive anonymous vaccination data.

If you consent to your data being shared with RIVM, it follows from the GDPR and the Dutch RIVM Act that RIVM has a valid ground for processing your data. The ground lies in the fact that RIVM has been entrusted with a task to be carried out in the public interest: to prevent and control infectious diseases. Carrying out that task requires the processing of personal data, including medical data about your vaccination. This means that RIVM will use and retain your data for the evaluation of the mpox vaccination programme.

For how long will we retain your data?

RIVM will not retain your data for longer than is necessary. We will retain your personal data and vaccination data in the registration system for 20 years¹.

Will we share your data with third parties?

In order to perform our legal duties, we may need to share data with other parties. If we share data with other parties, they will process the data in such a way that, when published or provided to third parties, it can under no circumstances be traced back to individuals.

As an example, we may include your data in reports to the Ministry of Health, Welfare and Sport (VWS). We may also publish these reports, for example on the RIVM website. These reports will contain only aggregated data (key figures) that cannot be traced back to individuals.

Your data may be used for scientific research, which is one of RIVM's legal duties. The data RIVM will receive and use for this research will have already been pseudonymised, i.e. your data will have been edited in such a way that it cannot be traced back to you when published. However, even if this is not the case, data in scientific publications will have been processed in such a way that it cannot be traced back to you.

¹ In accordance with the comments made on this subject in the parliamentary history concerning the National Immunisation Programme, as referred to in Section 6b of the Dutch Public Health Act in conjunction with Section 11 of the Dutch Public Health Decree, RIVM's retention period with regard to this data is in line with the Dutch Medical Treatment Contracts Act.

Where will your data be processed?

We will only store and process your data in the Netherlands, at the central government data centre in Amsterdam.

Will automated decision-making take place?

There will be no automated decision-making (without human intervention) based on profiling as part of the mpox vaccination programme. Profiling is the automated analysis of large amounts of personal data based on personal aspects in order to classify this data into categories (profiles). Automated individual decisions could be made based on these profiles.

What are your rights?

Under the GDPR, you have various rights when it comes to staying in control of your personal data. You can find these (in Dutch only) on the website of the Dutch Data Protection Authority by clicking on [this link](#). If you wish to exercise your rights, you will need to follow the procedure set out in [RIVM's general privacy statement](#).

In addition, you can have your registration in the vaccination register deleted at any time by informing the GGD that you are withdrawing your consent. If you do this, the GGD will no longer share data with RIVM from that point onwards. However, RIVM will continue to use any data collected up to the time your registration was deleted. The parts of your data that RIVM will use are not identifying data, i.e. cannot be traced back to you. As a result, RIVM cannot comply with a request for inspection or deletion, as it will not be possible to match that request to the data RIVM processes.

Who is the Data Protection Officer?

The Ministry of Health, Welfare and Sport has appointed a Data Protection Officer (DPO). The DPO is independent and acts as an internal regulator – including for RIVM, which is part of the Ministry. The DPO checks that the Ministry applies and complies with the rules of the law. You can reach the DPO by sending an email to FG-VWS@minvws.nl.

You have a complaint

What should you do? If you disagree with the way RIVM processes your data for the purpose of the mpox vaccination programme, you can file a complaint with:

- RIVM; visit <https://www.rivm.nl/en/contact/complaints>
- the Data Protection Officer; email address: FG-VWS@minvws.nl
- the Dutch Data Protection Authority; visit <https://autoriteitpersoonsgegevens.nl/nl/zelf-doen/gebruik-uw-privacyrechten/klacht-melden-bij-de-ap>

Amendment of the privacy statement

This privacy statement is subject to change. In that case, we will publish the amended privacy statement at <https://www.rivm.nl/en/mpox/vaccination/privacy>.

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