

## TRANSMISSION OF HEALTH DATA IN THE FRAMEWORK OF THE COVID-19 VACCINATION CAMPAIGN

### *Key information*

#### Controller

Cesare Onestini, Director of the ETF, [Cesare.Onestini@etf.europa.eu](mailto:Cesare.Onestini@etf.europa.eu)

#### Joint controller

Italian Ministry of Foreign Affairs and International Cooperation (Ministero degli Affari Esteri e della Cooperazione Internazionale, MAECI) and European Commission - Representation office in Rome (Italy) and relevant Italian authorities (Covid Call Center – Regione Piemonte).

#### Business owner

Cécile Beelaerts, Head of Resources unit, Strategy and Resources department, [Cecile.Beelaerts@etf.europa.eu](mailto:Cecile.Beelaerts@etf.europa.eu)

#### Data protection officer

Tiziana Ciccarone / Laurens Rijken, [DataProtectionOfficer@etf.europa.eu](mailto:DataProtectionOfficer@etf.europa.eu)

#### Purpose of the processing

The purpose of the processing is the transmission to the Italian health authorities of personal data of ETF staff, ETF pensioners and their family members (spouses and children) not enrolled in the Italian Health System, who want to be included in the Italian vaccination campaign against COVID-19, third dose vaccination and booster dose.

#### Legal basis

The processing occurs in compliance with EUDPR 2018/1725 Article 10, 2 (h) “occupational medicine” and (i) “public health, such as protecting against serious cross-border threats to health”.

The legal basis for the transfer of personal data is the Consent.

#### Personal data

Personal data concerned are:

- Mandatory: Name, date of birth, sex, ID card/passport/driving licence number (other document useful to that purpose), place of birth, information on seat of work, end date of presence on the Italian territory.
- If available: Italian fiscal code, foreign state of residence, telephone and email. Vulnerability category (1 or 4).
- Mandatory for being included in the list for 3<sup>rd</sup> doses or booster doses: relevant medical documents.

Provision of the data is freely given and consent based.

## Recipients of the personal data

For the purpose detailed above, access to personal data is provided to the following processing entities:

### ETF

- *HR officers in charge of health and communication with relevant Italian authorities and Directorate's officer*

### Externals (joint controller/processor)

- *Italian Ministry of Foreign Affairs and International Cooperation - Ministero degli Affari Esteri e della Cooperazione Internazionale, MAECI*
- *Italian Ministry of Health*
- *Italian national health service*
- *European Commission - Representation office in Rome (Italy)*
- *relevant Italian authorities (COVID Call center – Regione Piemonte)*
- *ETF Medical Advisor (assessment of medical file of staff members in relation to vulnerable categories)*
- *ETF General Practitioner (available on request of ETF staff members with access to their medical file)*

## Transfer to third countries/international organisations

Not applicable

## Further information

### Data retention

The personal data of staff members, including the consent to the transfer, will be added to the staff member medical file, and retained in accordance with the period set for the medical file.

The personal data of family members, including the consent to the transfer, will be deleted after the conclusion of the vaccination campaign.

The dedicated mailbox for receiving the data and consent from staff members and family members will be deleted after the conclusion of the vaccination campaign.

### Right of access, rectification or erasure, restriction, objection

Any request to access, rectify or erase personal data, or to restrict or object to the processing of personal data shall be addressed in writing to the Head of Resources unit, Strategy and Resources department, [mailto: Cecile.Beelaerts@etf.europa.eu](mailto:Cecile.Beelaerts@etf.europa.eu) giving details of the request.

### Right to lodge complaint

Data subjects can at any time lodge a complaint on the processing of their personal data to the ETF Data Protection Officer ([DataProtectionOfficer@etf.europa.eu](mailto:DataProtectionOfficer@etf.europa.eu)) or to the European Data Protection Supervisor (<http://www.edps.europa.eu>).

## Right to withdraw consent

Any request to withdraw consent to the processing of personal data shall be addressed in writing to the Head of Resources unit, Strategy and Resources department, <mailto:Cecile.Beelaerts@etf.europa.eu>.