

## Privacy policy: CoronaSneltest Nederland

### General information

The GDPR is the law for the protection of privacy and personal data. Under this law, an organization that works with personal data has certain obligations and the person whose data it belongs to has certain rights. In addition to this general law, specific rules apply to privacy in healthcare. These rules are stated, among other things, in the Dutch *Medical Treatment Contracts Act* (WGBO). These privacy regulations are intended to inform you about your rights and our obligations under the GDPR and the WGBO.

### 1. Lawfulness of processing

CoronaSneltest Nederland processes personal data on the basis of the medical treatment agreement which is regulated in the WGBO. This with due observance of the Temporary Act on test certificates Covid-19. Taking into account the inseparable link between the data processing in the context of the Testen voor toegang and Testen voor je reis, the aforementioned basis, the medical treatment agreement, will also form the basis for the core of the processing activities.

On parts of the processing, other bases also form the basis for the necessary processing in the context of Testing for Entry and Testing before Departure (for example, the legal basis necessary for processing your National Identification Number or type of identity document and explicit permission for passing on the telephone number and email address to the GGD).

The following principles apply:

- Article 6(1)(a) of the General Data Protection Regulation: the data subject has given permission for the processing of his or her personal data for one or more specific purposes, namely for passing on his or her telephone number and e-mail address to the GGD in the event of a positive test result;
- Article 6(1)(b) of the General Data Protection Regulation: the processing is necessary for the performance of an agreement to which the data subject to, or in order to take measures at the request of the data subject before concluding an agreement. The legal ground applies to personal data that are processed from the citizen in the context of the implementation of the medical treatment agreement, including taking the test and communicating the test result.
- Article 6(1)(c) of the General Data Protection Regulation: the processing is necessary to comply with a legal ground to which the controller is responsible. This legal ground applies to the personal data that is collected for and, if there is a positive test result, shared with the GGD. The Dutch *Public Health Act* (WPG) obliges CoronaSneltest Nederland to report a positive test result to the GGD, whereby the report is accompanied by (special) personal data of the citizen.

### 2. Personal data we collect and process

Various personal data about you can be processed during the test. This includes both general and special categories of personal data. This is necessary to be able to treat you medically and necessary for the financial settlement of the treatment. In addition, processing may be necessary for, for

example, combating a serious danger to your health or to comply with a legal obligation (for example, the mandatory reporting of an infectious disease under the WPG)

Below you will find an overview of the personal data that we process:

- Name;
- Surname;
- Gender;
- Date of birth;
- Postal code and house number
- Mobile phone number;
- E-mail address
- Social Security Number;
- Documentnumber of ID
- Booking number;
- Barcode;
- Testkit/Tube ID;
- Medical complaints of the data subject;
- Covid-19 Testresults;

### **3. Special categories of personal data**

Some personal data is extra sensitive, because the processing of these type of data can have a major impact on someone's life. Data that says something about someone's health is special personal data.

At CoronaSneltest Nederland, medical and genetic data are processed. This data is additionally protected by law. Personal data of children is always sensitive and therefore receives extra protection.

#### **Processing of special categories of personal data**

Article 9(2)(h) GDPR - Article 30(3)(a) The GDPR Execution Act(UAVG): processing is necessary for the provision of healthcare and proper care by CoronaSneltest Nederland. This exception applies to personal data that are processed from the data subject in the context of the execution of the medical treatment agreement, including taking the test and communicating the test result.

Article 9(2)(i) GDPR - Article 22-24(1) WPG: processing is necessary for the performance of a task carried out in the public interest, this concerns public health. This exception applies to the personal data that is collected for and, if there is a positive test result, shared with the GGD. The WPG obliges CoronaSneltest Nederland to report a positive test result to the GGD, whereby the report is accompanied by special category of data of the data subject.

#### **Processing of the Social Security Number**

Processing of the Social Security Number legal is permitted on the basis of the following legal provisions:

#### **Wabvpz**

Pursuant to Article 5(1) of the Wabvpz, a healthcare provider within the meaning of the Wkkgz must establish a client's identity and Social Security Number when the data subject first turns to the healthcare provider to obtain care.

Pursuant to Article 6(2) of the Wabvpz, a healthcare provider must record the nature and number of a document as referred to in Article 1 of the Identification Act in its records.

Pursuant to Article 8(1) of the Wabvpz, a healthcare provider will include the Social Security Number of the data subject in its administration when recording personal data with regard to the provision of healthcare.

#### **WPG**

Article 24(1)(a) of the WPG, 'notification of infectious diseases to the municipal health service', states: The notification referred in Articles 21(1) and 22 contains to the following personal data: name, address, gender, date of birth, social security number and the place of residence of the person concerned.

## **4. The purposes of the processing**

CoronaSneltest Nederland is, according to the GDPR, responsible for the processing of personal data that takes place in practice.

The following purposes of processing are:

- To be able to administer the appointment for the test, made by the data subject;
- To register and to identify the data subject;
- To perform the test;
- To link the test result to the data subjects personal data;
- To communicate the availability of the test result to the data subject;
- To share the Test Result with the data subject for the purpose of evidence of the test
- To inform the GGD in case of a positive test;
- To comply with the legal obligations of the controller under other legislation.

## **5. The rights of the data subject**

- The right to information, to inform the data subject about which personal data and for what purpose the personal data are processed;
- The right to access. The data subject shall have the right to obtain from the controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data;
- The right to rectification. The data subject shall have the right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her;
- The right to erasure. The data subject shall have the right to obtain from the controller the erasure of personal data concerning him or her without undue delay and the controller shall have the obligation to erase personal data without undue delay;
- The right of restriction of processing. The data subject shall have the right to obtain from the controller restriction of processing.
- The right to add a personal statement (of a medical nature) to your file.

If you want to exercise your rights, you can send an e-mail to: [info@coronasneltestnederland.nl](mailto:info@coronasneltestnederland.nl).

## 6. Data retention

A storage period of 12 months\* (from the last treatment) applies to medical data, unless longer storage is necessary. For example, for the health of the patient or the patient's children. This is at the discretion of the practitioner. The personal data processed by CoronaSneltest Nederland, which are necessary for the testing process, are not kept longer than legally necessary.

\*due to 'Tijdelijke wet testbewijzen Covid-19'.

- In the event of a negative test result, the data subject's, postal code and house number, mobile telephone number, e-mail address, booking number and Test Kit/Tube ID will be stored for 48 hours and then deleted;
- In the event of a negative test result the data subject's name and surname, date of birth, Social Security Number, barcode, test result and document number ID are kept for 4 weeks;
- After the doctor has informed the GGD about a positive test result, postal code and house number, mobile telephone number, e-mail address, booking number and Test Kit/Tube ID will be stored for 48 hours and then deleted;
- After the doctor has informed the GGD, the data subject's name and surname, date of birth, Social Security Number, barcode, test result and document number ID are kept for 1 year;

## 7. Processing personal data to third parties

CoronaSneltest Nederland does not exchange your relevant medical data to third parties, except for the legally required notification of a positive test result to the GGD and the laboratory that is engaged for the performance of the PCR test.

## 8. The security of your personal data

CoronaSneltest Nederland pays a lot of attention to technical and organizational forms of security of your data. Your personal data is well protected against unauthorized access. If you would like to know more about which technical and organizational measures, please send an email to: [info@coronasneltestnederland.nl](mailto:info@coronasneltestnederland.nl).

## 9. Automated decision-making

We do not make decisions based on automated processing on matters that can have (significant) consequences for people. These are decisions taken by computer programs or systems, without involving a person (for example, an employee of ours).

## 10. Question or complaint?

Do you have a question or a complaint? For example, about who we share data with or our handling of your medical data? Then you can send an e-mail to: [info@coronasneltestnederland.nl](mailto:info@coronasneltestnederland.nl).

We would also like to point out that you have the opportunity to file a complaint with the national supervisory authority, De Autoriteit Persoonsgegevens. You can do that by the following link: <https://autoriteitpersoonsgegevens.nl/nl/contact-met-de-autoriteit-persoonsgegevens/tip-ons>.

## 11. Amendments

This privacy statement may be changed by Bodeldijk V.A.W. from time to time. On this webpage you will always find the latest version of our privacy statement (last modified on 14-06-2021). For further information about this privacy statement, please contact [info@coronsneltest.nl](mailto:info@coronsneltest.nl)

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