

**To:** [REDACTED] [REDACTED]@minvws.nl]  
**Sent:** Mon 11/30/2020 4:08:56 PM  
**Subject:** RE: Go for production - Updated privacy documents  
**Received:** Mon 11/30/2020 4:08:53 PM

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**Van:** [REDACTED] [REDACTED]@minvws.nl>  
**Verzonden:** maandag 30 november 2020 17:05  
**Aan:** [REDACTED] [REDACTED]@minvws.nl>  
**Onderwerp:** RE: Go for production - Updated privacy documents

Dank. Hoe kan privacy statement nu nog een ding zijn?

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**Van:** [REDACTED] [REDACTED]@minvws.nl>  
**Verzonden:** maandag 30 november 2020 17:04  
**Aan:** [REDACTED] [REDACTED]@minvws.nl>  
**Onderwerp:** FW: Go for production - Updated privacy documents

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**Van:** [REDACTED] [REDACTED]@srd-rechtsanwaelte.de>  
**Verzonden:** maandag 30 november 2020 17:02  
**Aan:** [REDACTED] [REDACTED]@ec.europa.eu; [REDACTED] [REDACTED]@klimas.legal  
**CC:** [REDACTED] [REDACTED]@vka.nl; [REDACTED] [REDACTED] [REDACTED] [REDACTED]@minvws.nl>; [REDACTED] [REDACTED] [REDACTED] [REDACTED]@minvws.nl>; [REDACTED] [REDACTED] [REDACTED] [REDACTED]@minvws.nl>; [REDACTED] [REDACTED] [REDACTED] [REDACTED]@ec.europa.eu; [REDACTED] [REDACTED] [REDACTED] [REDACTED]@ec.europa.eu; [REDACTED] [REDACTED] [REDACTED] [REDACTED]@ec.europa.eu; [REDACTED] [REDACTED] [REDACTED] [REDACTED]@ec.europa.eu; [REDACTED] [REDACTED] [REDACTED] [REDACTED]@ext.ec.europa.eu  
**Onderwerp:** Re: Go for production - Updated privacy documents

Dear [REDACTED]

I can also confirm green light for the Netherlands.

Nevertheless I see the same issues with the privacy statement already raised by [REDACTED]

Best regards,

[REDACTED]

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**Von:** "[REDACTED] [REDACTED]@ec.europa.eu" <[REDACTED] [REDACTED]@ec.europa.eu>  
**Datum:** Montag, 30. November 2020 um 16:53  
**An:** "[REDACTED] [REDACTED]@klimas.legal" <[REDACTED] [REDACTED]@klimas.legal>, [REDACTED] [REDACTED] [REDACTED] [REDACTED]@srd-rechtsanwaelte.de>  
**Cc:** "[REDACTED] [REDACTED]@vka.nl" <[REDACTED] [REDACTED]@vka.nl>, "[REDACTED] [REDACTED]@minvws.nl" <[REDACTED] [REDACTED]@minvws.nl>, "[REDACTED] [REDACTED]@minvws.nl" <[REDACTED] [REDACTED]@minvws.nl>, "[REDACTED] [REDACTED]@minvws.nl" <[REDACTED] [REDACTED]@minvws.nl>, "[REDACTED] [REDACTED]@ec.europa.eu" <[REDACTED] [REDACTED]@ec.europa.eu>, "[REDACTED] [REDACTED]@ec.europa.eu" <[REDACTED] [REDACTED]@ec.europa.eu>, "[REDACTED] [REDACTED]@ec.europa.eu" <[REDACTED] [REDACTED]@ec.europa.eu>, "[REDACTED] [REDACTED]@ec.europa.eu" <[REDACTED] [REDACTED]@ec.europa.eu>, "[REDACTED] [REDACTED]@ec.europa.eu" <[REDACTED] [REDACTED]@ec.europa.eu>, "[REDACTED] [REDACTED]@ec.europa.eu" <[REDACTED] [REDACTED]@ec.europa.eu>, "[REDACTED] [REDACTED]@ext.ec.europa.eu" <[REDACTED] [REDACTED]@ext.ec.europa.eu>  
**Betreff:** RE: Go for production - Updated privacy documents

Dear [REDACTED]

Many thanks for your green light. I have just received the update from the Dutch team and TSI that acceptance testing is complete.

5.1.2e As a co-chair, could you please confirm green light from JC to proceed with the next steps?

Kind regards,

5.1.2e

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**From:** 5.1.2e (SANTE)  
**Sent:** Monday, November 30, 2020 1:33 PM  
**To:** 5.1.2e <5.1.2e@klimas.legal>; 5.1.2e @minvws.nl  
**Cc:** 5.1.2e @vka.nl; 5.1.2e @minvws.nl; 5.1.2e @minvws.nl; 5.1.2e <5.1.2e@srd-rechtsanwaelte.de>; 5.1.2e <5.1.2e@minvws.nl>; EHEALTH NETWORK <5.1.2e@ec.europa.eu>; 5.1.2e (SANTE) <5.1.2e@ec.europa.eu>; 5.1.2e (CNECT) <5.1.2e@ec.europa.eu>; 5.1.2e (SANTE) <5.1.2e@ec.europa.eu>; 5.1.2e (SANTE) <5.1.2e@ec.europa.eu>; 5.1.2e (SANTE) <5.1.2e@ec.europa.eu>; 5.1.2e (SANTE-EXT) <5.1.2e@ext.ec.europa.eu>  
**Subject:** RE: Go for production - Updated privacy documents

Many thanks for this, 5.1.2e

I leave it up to our Dutch colleagues to reply in the substance. I also cc 5.1.2e for his awareness.

Kind regards,

5.1.2e

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**From:** 5.1.2e <5.1.2e@klimas.legal>  
**Sent:** Monday, November 30, 2020 1:29 PM  
**To:** 5.1.2e (SANTE) <5.1.2e@ec.europa.eu>; 5.1.2e @minvws.nl; 5.1.2e <5.1.2e@srd-rechtsanwaelte.de>  
**Cc:** 5.1.2e @vka.nl; 5.1.2e @minvws.nl; 5.1.2e @minvws.nl; 5.1.2e @srd-rechtsanwaelte.de; EHEALTH NETWORK <5.1.2e@ec.europa.eu>; 5.1.2e (SANTE) <5.1.2e@ec.europa.eu>; 5.1.2e (CNECT) <5.1.2e@ec.europa.eu>; 5.1.2e (SANTE) <5.1.2e@ec.europa.eu>; 5.1.2e (SANTE) <5.1.2e@ec.europa.eu>; 5.1.2e (SANTE-EXT) <5.1.2e@ext.ec.europa.eu>  
**Subject:** Re: Go for production - Updated privacy documents

Dear 5.1.2e Dear 5.1.2e

if this link: [CoronaMelder and abroad](https://ec.europa.eu/health/ehealth/covid-19) in privacy statement leads here: [https://ec.europa.eu/health/ehealth/covid-19](https://ec.europa.eu/health/sites/health/files/ehealth/docs/gateway_jointcontrollers_en.pdf) or here: [https://ec.europa.eu/health/sites/health/files/ehealth/docs/gateway\\_jointcontrollers\\_en.pdf](https://ec.europa.eu/health/sites/health/files/ehealth/docs/gateway_jointcontrollers_en.pdf), I am ok with provided document. Unfortunately I cannot check it (the link leads to non-existing webpage).

Long story short: **The privacy statement is not perfect, but I give green light for going live.**

**Issues to be addressed after going live:**

- 1) I also had the trouble assessing who the data controller really is, please consider rewriting this section and providing better explanation in this regard.
- 2) privacy statement links to implementing decision without informing about Annex II and why this Annex is important, consider providing explanation in this regard
- 3) please link to the European Commission site for more information: <https://ec.europa.eu/health/ehealth/covid-19>

One (hopefully) last question: the only processor in your app is European Commission, is it right? Is this the only processor in your app?

@ 5.1.2e would you like to add anything?

Best regards

5.1.2e

M: + 5.1.2e

E: [REDACTED]@klimas.legal

W: [www.klimas.legal](http://www.klimas.legal)[Connect with me via LinkedIn](#)**Od:** "[REDACTED] 5.1.2e @ec.europa.eu" <[REDACTED] 5.1.2e @ec.europa.eu>**Data:** poniedziałek, 30 listopada 2020 o 12:11**Do:** "[REDACTED] 5.1.2e @klimas.legal" <[REDACTED] 5.1.2e @klimas.legal>, "[REDACTED] 5.1.2e @srd-rechtsanwaelte.de" <[REDACTED] 5.1.2e @srd-rechtsanwaelte.de>**DW:** "[REDACTED] 5.1.2e @minvws.nl" <[REDACTED] 5.1.2e @minvws.nl>, "[REDACTED] 5.1.2e @vka.nl" <[REDACTED] 5.1.2e @vka.nl>, "[REDACTED] 5.1.2e @minvws.nl" <[REDACTED] 5.1.2e @minvws.nl>, "[REDACTED] 5.1.2e @minvws.nl" <[REDACTED] 5.1.2e @minvws.nl>, "[REDACTED] 5.1.2e @ec.europa.eu" <[REDACTED] 5.1.2e @ec.europa.eu>, "[REDACTED] 5.1.2e @ec.europa.eu" <[REDACTED] 5.1.2e @ec.europa.eu>, "[REDACTED] 5.1.2e @ec.europa.eu" <[REDACTED] 5.1.2e @ec.europa.eu>, "[REDACTED] 5.1.2e @ec.europa.eu" <[REDACTED] 5.1.2e @ec.europa.eu>, "[REDACTED] 5.1.2e @ec.europa.eu" <[REDACTED] 5.1.2e @ec.europa.eu>, "[REDACTED] 5.1.2e @ext.ec.europa.eu" <[REDACTED] 5.1.2e @ext.ec.europa.eu>**Temat:** FW: Go for production - Updated privacy documents

Dear [REDACTED] 5.1.2e

Could you please confirm whether all your concerns are addressed? Or are you expecting further updates from our colleagues in The Netherlands? In my understanding, we have not received additional comments from the other members of the Joint Controllers, but I will confirm this with our secretariat. If your concerns are addressed and there are no other comments from the Joint Controllers, the approval for go-live should be considered granted for the NL, subject to completion of the technical onboarding steps.

On the technical onboarding steps, the latest update from TSI is that acceptance testing is yet not complete, and that the Dutch technical team, TSI and DIGIT (EC) are currently working to solve issues in acceptance.

Once this is complete, and on the basis of the approval for go-live, we will proceed with connecting NL to the EFGS PROD environment.

Kind regards,

[REDACTED] 5.1.2e

[REDACTED] 5.1.2e

**European Commission**

Directorate-General for Health and Food Safety (DG SANTE)  
 Directorate B – Health Systems, Medical Products and Innovation  
 Unit [REDACTED] 5.1.2e – European Reference Networks and Digital Health

B-232 [REDACTED] 5.1.2e  
 B-1049 Brussels/Belgium

+32 [REDACTED] 5.1.2e  
 [REDACTED] 5.1.2e @ec.europa.eu

**From:** [REDACTED] 5.1.2e ) <[REDACTED] 5.1.2e @minvws.nl>**Sent:** Sunday, November 29, 2020 10:20 PM**To:** [REDACTED] 5.1.2e <[REDACTED] 5.1.2e @srd-rechtsanwaelte.de>; [REDACTED] 5.1.2e <[REDACTED] 5.1.2e @vka.nl>; [REDACTED] 5.1.2e <[REDACTED] 5.1.2e @klimas.legal>; EHEALTH NETWORK <[REDACTED] 5.1.2e @ec.europa.eu>; [REDACTED] 5.1.2e



< 5.1.2e @ec.europa.eu>; 5.1.2e < 5.1.2e @minvws.nl>  
**Cc:** 5.1.2e 5.1.2e ) < 5.1.2e @minvws.nl>; 5.1.2e ) < 5.1.2e @minvws.nl>; 5.1.2e (SANTE)  
 < 5.1.2e @ec.europa.eu>; 5.1.2e (CNECT) < 5.1.2e @ec.europa.eu>  
**Subject:** RE: Go for production - Updated privacy documents

Dear 5.1.2e

Thank you for reaching out for clarification.

The Minister of Health, Welfare and Sport is controller. This is set in our national law.

CIBG is an internal organization of the ministry of health, welfare and sport and under direct control of the minister. Within the ministry CIBG is appointed as server management organization regarding CoronaMelder and point of contact for interoperability of notification applications.

As an internal organization of The ministry of Health, CIBG has no separate legal status in terms of GDPR.

Kind regards,

5.1.2e



5.1.2e

5.1.2e

Ministerie van Volksgezondheid, Welzijn en Sport

5.1.2e @minvws.nl | 06 5.1.2e

Parnassusplein 5 | 2511 VX | Den Haag  
 Postbus 20350 | 2500 EJ | Den Haag

**Van:** 5.1.2e < 5.1.2e @srd-rechtsanwaelte.de>

**Verzonden:** zondag 29 november 2020 21:36

**Aan:** 5.1.2e < 5.1.2e @vka.nl>; 5.1.2e < 5.1.2e @klimas.legal>; 5.1.2e @ec.europa.eu; 5.1.2e @ec.europa.eu; 5.1.2e < 5.1.2e @minvws.nl>

**CC:** 5.1.2e ) < 5.1.2e @minvws.nl>; 5.1.2e ) < 5.1.2e @minvws.nl>; 5.1.2e . ( 5.1.2e ) < 5.1.2e @minvws.nl>; 5.1.2e @ec.europa.eu; 5.1.2e @ec.europa.eu

**Onderwerp:** Re: Go for production - Updated privacy documents

Dear Colleagues, Dear 5.1.2e

thanks for providing us with the updated document.

I have one important remarks:

1. The privacy policy mentions the Minister of Health, Welfare and Sport as Controller. In the application form the CIBG is named as controller. Could you please clarify?

Thanks and best regards,

5.1.2e

**Von:** 5.1.2e < 5.1.2e @vka.nl>

**Datum:** Freitag, 27. November 2020 um 11:48

**An:** 5.1.2e < 5.1.2e @klimas.legal>, " 5.1.2e @ec.europa.eu" < 5.1.2e @ec.europa.eu>, " 5.1.2e @ec.europa.eu", " 5.1.2e @ec.europa.eu" < 5.1.2e @ec.europa.eu>, " 5.1.2e" < 5.1.2e @minvws.nl>



5.1.2e

5.1.2e

5.1.2e



Zelf doen of uitbesteden?

From: 5.1.2e <5.1.2e@ec.europa.eu> <5.1.2e@ec.europa.eu> <5.1.2e@ec.europa.eu>  
 Date: Thursday, 26 Nov 2020, 11:47 PM  
 To: 5.1.2e <5.1.2e@minvws.nl> <5.1.2e@minvws.nl>  
 Cc: 5.1.2e <5.1.2e@ec.europa.eu> <5.1.2e@ec.europa.eu> <5.1.2e@ec.europa.eu>, 5.1.2e <5.1.2e@ext.ec.europa.eu> <5.1.2e@ext.ec.europa.eu>, 5.1.2e <5.1.2e@ext.ec.europa.eu>, 5.1.2e <5.1.2e@minvws.nl> <5.1.2e@minvws.nl>, 5.1.2e <5.1.2e@minvws.nl>, 5.1.2e <5.1.2e@minvws.nl>, 5.1.2e <5.1.2e@ec.europa.eu> <5.1.2e@ec.europa.eu>, 5.1.2e <5.1.2e@ec.europa.eu> <5.1.2e@ec.europa.eu>

Subject: Re: Go for production - Updated privacy documents

Dear 5.1.2e

Sorry for the late reply, but it was a very hectic day On the deadline for comments, we can send tomorrow an email asking for comments by COB However, I t would help if you sent a revised privacy notice Personally, I am convinced that it would be useful to let Damian and the group know how do you plan to remedy their comments? The comments are not major as far as I have seen and request re-reading the privacy notice, polishing and addressing the comments It is important to be correct, as PN is the interface for the citizens of other MS Let us know if a further clarification meeting is needed or you just prefer to send a revised privacy notice that we can share with the group

MS are joint controllers and JC group took this task very seriously (also with your help) As you know, several MS have not received their ok to start the testing procedure given the legal basis, even if their national lawyers considered that everything was fine COM, as processor, does everything in its power to support this process, but the decision is with the MS Please les us know how you want to proceed

5.1.2e

On 26 Nov 2020, at 14:57, 5.1.2e <5.1.2e@minvws.nl> wrote:

Dear eHealth Network secretariat, Dear 5.1.2e

With reference to the below message, this has created confusion as to the moment of going live for us, and we are have our objection towards this. The Netherlands has assumed and is still assuming that going live with the EFGS is taking place on Monday 30/11 (according to the schedule provided by the EC and agreed in the relevant



working groups) and will be given the necessary certificates to exchange with the EFGS. Everything at national level is currently planned toward going live on 30/11.

The below message however shows the possibility for comments on the day of going live itself 30/11 which is confusing. Referring back to the agreed planning, the final preparations should be finalized this week.

In addition, we expect that the comments on the privacy statements are not to be a blocking factor for The NL to go live as the newly applied changes in our Privacy Statement are in complete conformity with the requested.

Therefore, we are requesting an explanation as to why the below mentioned message is referring to a deadline of Monday 30/11? And what this means for receiving the needed certificates for going live?

Best,

5.1.2e

<image002.jpg>

Ministerie van Volksgezondheid, Welzijn en Sport Ministry of Health, Welfare and Sport Directie Informatiebeleid/ Directorate Information Policy Parnassusplein 5, 2511 VX, Den Haag

Email: 5.1.2e @minvws.nl <5.1.2e @minvws.nl>

T: +316 5.1.2e

Van: 5.1.2e @ec.europa.eu <5.1.2e @ec.europa.eu>

Verzonden: donderdag 26 november 2020 12:48

Aan: 5.1.2e @ec.europa.eu

Onderwerp: NL: Go for production - Updated privacy documents

Urgentie: Hoog

Dear Members of the Joint Controller subgroup, Dear Members of the Technical working group, Dear colleagues,

With thanks to our colleagues in the Netherlands, please see message below and attached updated documents so they can proceed with their connectivity.

Any remaining comments on their application should be provided by Monday 30/11 noon.

Best regards,

The eHealth Network Secretariat

<image003.png>

European Commission

Directorate-General for Health and Food Safety Unit B3 - European Reference Networks and Digital Health Rue

Breydel 4 – B232 8/004

1049 Brussels/Belgium

5.1.2e @EC.EUROPA.EU <5.1.2e @EC.EUROPA.EU>

Please consider your impact on the environment before printing this email.

From: CIBG eHealth EU

Sent: Thursday, November 26, 2020 10:20 AM

To: EHEALTH NETWORK <5.1.2e @ec.europa.eu <5.1.2e

5.1.2e @ec.europa.eu>>;

Subject: Go for production

Dear representatives,

Following up on the discussion Yesterday we would like to have a Go for exchanging certificates for production connectivity.

Open question was to add :

- A reference to the EFGS in the privacy notice which will be accessible via the app;

o This has been added by adding a reference to the privacy notice, see the attached files (Dutch and a machine translation in English);

- To add a reference to the currently connected countries and representatives (JC);

o This has been added to the Frequently asked questions on the website [www.coronamelder.nl](http://www.coronamelder.nl) <[https://urldefense.com/v3/\\_http://www.coronamelder.nl\\_!!DOxrgLBm!XaIS54O\\_bbCx11TSBBuG7Ns2gIxmazG5zZSmt5pa4EvCA4ceVooR8ExOaK-NXbrUqemQAw\\$](https://urldefense.com/v3/_http://www.coronamelder.nl_!!DOxrgLBm!XaIS54O_bbCx11TSBBuG7Ns2gIxmazG5zZSmt5pa4EvCA4ceVooR8ExOaK-NXbrUqemQAw$)> (but will only be available after a go for production due to communication effectivity);

We are looking forward, to a go for production, can you please confirm a go and make sure we can exchange our production certificates;

5.1.2e

5.1.2e

[www.cibg.nl](http://www.cibg.nl) <[https://urldefense.com/v3/\\_http://www.cibg.nl\\_!!DOxrgLBm!XaIS54O\\_bbCx11TSBBuG7Ns2gIxmazG5zZSmt5pa4EvCA4ceVooR8ExOaK-NXbo8zA8Yyg\\$](https://urldefense.com/v3/_http://www.cibg.nl_!!DOxrgLBm!XaIS54O_bbCx11TSBBuG7Ns2gIxmazG5zZSmt5pa4EvCA4ceVooR8ExOaK-NXbo8zA8Yyg$)>

Afwezig op 5.1.2e