

Regional privacy statement layout for the GGD Health Monitor 2024

At least once every four years, GGD Kennemerland is commissioned by the municipalities to monitor the health, well-being and lifestyle of adults and the elderly. This is the GGD Health Monitor. The GGD Health Monitor 2024 will be carried out between September and December 2024 among adults (18–64) and the elderly (65+). The obligation to carry out this monitor is set out in the Dutch Public Health Act (*Wet publieke gezondheid, Wpg*).

The GGD Health Monitor 2024 is a collaboration between the 25 GGDs (Regional Public Health Services), the public health department of the municipality of Utrecht, the National Institute for Public Health and the Environment (RIVM) and Statistics Netherlands (CBS). The GGD Health Monitor 2024 will be carried out in the same manner and at the same time by every GGD in the Netherlands. The Dutch Ministry of Health, Welfare and Sport (VWS) commissioned RIVM and GGD GHOR Nederland (the national association of GGDs and GHOR-offices) to support the GGDs and the municipality of Utrecht in setting up and implementing the study as well as in processing the data. CBS provides support for the GGD Health Monitor, for example by creating the random sample population for the monitor.

The parties involved in the GGD Health Monitor 2024 will process sensitive and non-sensitive personal data. In this privacy statement, GGD Kennemerland describes how it will handle the sensitive and non-sensitive personal data provided in the GGD Health Monitor 2024 questionnaires, the resulting research results, and the measures that it will take to ensure that these are properly protected.

Aims of the GGD Health Monitor 2024:

- To obtain insight into the health situation of the population adults aged 18 to 64 and elderly people aged 65 and over.
- Monitoring this health situation over time;
- To develop local and national policy to promote health, wellbeing and lifestyle for the adults aged 18 to 64 and elderly people aged 65 and over.

The implementation of the GGD Health Monitor 2024 consists of the following components:

- Approach adults and elderly people to participate in the study by sending invitation letters.
- Collecting data from digital and paper questionnaires.
- Analyzing the answers from the questionnaires so that national, regional and local insights can be provided at group level.

Will GGD Kennemerland, RIVM and CBS process my personal data and, if so, which?

To carry out the study and achieve the goals, GGD Kennemerland, RIVM and CBS use questionnaires to collect data about you. Not every resident aged 18 and over will be invited to take part in the monitor. CBS will draw a random sample for the GGD Health Monitor 2024 for the GGDs and municipality of Utrecht. This means that adults (18–64) and the elderly (65+) who live in a municipality (or particular neighbourhood) will be selected at random. GGD Kennemerland has

commissioned Ipsos I&O to send the invitations to participate in the study. For this purpose CBS will send the names and addresses to Ipsos I&O. If you decide to participate and complete the questionnaire, your personal data will be collected and processed. Ipsos I&O collects all completed questionnaires.

The questionnaire

GGD Kennemerland uses a questionnaire for the GGD Health Monitor 2024. Participants in the monitor may fill in the questionnaire online or on paper. The English language version is only available online. The questionnaire is used to collect data on the health, lifestyle and well-being of residents. The questionnaire covers the following topics:

- Personal data: year of birth, gender, household composition, level of education, work situation, financial situation, volunteer work.
- Sensitive personal data: general state of health, chronic disorders, long covid / post-covid, limitations (only 65 years and older), fall accidents (65 years and over), mental health, stress, resilience, control of one's life, loneliness, social support, suicidal thoughts, height and weight, smoking and vaping habits, alcohol use, drug use (18-65 year old), nutrition, exercise, provision of informal care, noise pollution, sleep disturbance, sleep quality, odour pollution, social environment, satisfaction with living environment, access to cooler areas during hot spells.

Legal grounds for the GGD Health Monitor 2024

GGD Kennemerland and RIVM are conducting this study as a task carried out in the public interest, which is the monitoring of public health on the grounds of the Dutch Public Health Act (Article 2, paragraph 2a and b and article 5a of the 'Wet publieke Gezondheid', Wpg) and on the basis of the RIVM act (Article 3, paragraph 1b of the RIVM act).

When carrying out the GGD Health Monitor 2024, GGD Kennemerland and RIVM only use the data that is necessary for the performance of the statutory tasks.

The legal grounds for GGD Kennemerland and RIVM to process sensitive personal data can be found in Article 9(2)(i) of the DPR, which states that the processing of data is necessary for the task of public interest. This task is described in the Wpg and the RIVM Act, as stated above.

You can find more information about how CBS handles your personal data [here](#).

Is it mandatory to participate?

No, participation in the GGD Health Monitor 2024 is entirely voluntary. By completing the questionnaire (and sending it, if you fill it out on paper), you agree to participate in the GGD Health Monitor 2024. You can stop filling in the (online) questionnaire at any time. You can also skip questions if you don't want to fill them in. As soon as you start filling in the digital questionnaire, your data will be stored. If you want to stop halfway through and do not want the answers filled in up to that point to be kept, you must return through the questionnaire and delete the answers. Before you start filling in the questionnaire, you can read how you can do this. You can also contact Ipsos I&O. At the end of this privacy statement you can find more information about contacting Ipsos I&O.

To make clear that the questionnaire asks about your health, it is explained before the start of the questionnaire that the questionnaire asks questions about health, lifestyle and well-being.

Prior to processing, you will receive information that it concerns a questionnaire with health data that will be processed at group level by the RIVM, CBS and the regional GGD. In this way, the data subject knows that special personal data may be processed, but the controller does not invoke the exception ground for consent in Articles 6 and 9 of the GDPR.

Your answers will be processed confidentially, will be stored safely and will not be shared with any party that is not named in this privacy statement.

Who will have access to the data collected for the GGD Health Monitor 2024?

- Only employees of GGD Kennemerland who are responsible for processing the study data will have access to the data. The answers will be handled and processed in strict confidence.
- GGD Kennemerland has commissioned the research agency Ipsos I&O to distribute and collect the questionnaires, send giftcards towards the winning participants and to provide temporary data storage. This external party is also bound by strict conditions regarding security measures and confidentiality. A processor agreement has been concluded with Ipsos I&O in which these conditions are described.
- GGD GHOR Nederland will process the personal data for the GGD's. GGD GHOR Nederland is responsible for cleaning of the datasets. They do this on behalf of the GGDs. This is been set out in agreements drawn up between the cooperating parties.
- RIVM and CBS receive the results of the completed questionnaires, excluding the specific local questions asked by GGD Kennemerland, so that they can support the GGDs and the municipality of Utrecht. This is laid down in a covenant which contains the agreements made by the cooperating parties.
- GGD GHOR Nederland receives only a dataset without identifiable data. GGD GHOR Nederland, the association of the GGDs, can thus support the GGDs in carrying out analyses at a national level.
- Third parties may carry out research using the national data files produced for the GGD Health Monitor 2024, but to do so they must first submit an application to <https://www.monitorgezondheid.nl/data-aanvraag>. The application will then be assessed by the *Registratiecommissie Gezondheidsmonitors* (Health Monitor Registration Committee), who will check that the application meets the required criteria. Third parties who obtain authorisation to access the database and wish to carry out analyses using this data may only access the data through the CBS Remote Access (RA) environment, for which CBS-institutional authorisation is required.

How do the GGD Kennemerland, RIVM and CBS use the data from the completed questionnaires?

On the basis of its public task, GGD Kennemerland produces reports for municipalities based on the data collected. These are regional reports, reports on sub-regions and reports for municipalities.

Measures have been taken to ensure that data in these reports cannot be traced back to individuals, by only reporting on groups. These reports are used to make policies on health.

RIVM and CBS can also use the results of the GGD Health Monitor 2024 for research and publication. Again, these studies only report on groups, which means that people cannot be directly traced.

How do we protect your data?

GGD Kennemerland, RIVM, CBS and GGD GHOR Nederland consider privacy to be very important. In the exceptional case that the answers to the questionnaire can lead to a person, measures will be taken to prevent traceability. All organisations involved are also taking various measures to ensure that the completed questionnaires are properly secured. For example, secure programs with two-step verification are used to send data files. As mentioned, only employees involved in the GGD Health Monitor 2024 have access to the completed questionnaires. Moreover, the researchers have signed a duty of confidentiality and are not allowed to do anything that could connect the answers to a person.

Does GGD Kennemerland, RIVM or CBS know who I am?

For the GGD Health Monitor 2024, it is not an end in itself to process (special) personal data, but to get a picture of health. For GGD Kennemerland and the RIVM, it is not possible to directly trace who gave which answers. Based on the combination of the answers given, in very exceptional cases, it may still be possible to trace the back to a person. CBS is also a collaborator in this study. CBS does have the ability to directly tracing data back to you as a person. With a unique serial number from the sample, CBS can link the data from the questionnaire to other data at CBS. One of the reasons CBS does this is to weigh the results. Weighing is necessary to ensure that the participants are a good reflection of the population. Population groups that participated relatively little are then counted more heavily in the results. Groups that have participated relatively often are counted less heavily. In addition to the data collected from the GGD Health Monitor, CBS also receives many files from other institutions. This contains, for example, data on income and population. CBS merges this information with the GGD Health Monitor. As a result, the GGD has to request less information in the questionnaire. No persons can be identified in the aggregated information that GGDs receive from CBS.

How long will the data collected for the GGD Health Monitor 2024 be stored for?

GGD Kennemerland stores the data files for 15 years, because the GGD Health Monitor 2024 aims to monitor the health situation of adults and the elderly over time (monitoring). This means that the GGD Kennemerland, the RIVM and the CBS must continue to have access to the completed questionnaires so that it can achieve the aforementioned goals and continue to carry out the tasks correctly. The law does not stipulate a specific period for the retention of non-directly traceable data.

The raw data that is not used for reporting will be kept until the analyses have been performed and the results have been published (mid-2025). In this way, any errors in the processing of the data can still be corrected. Name and address details will be deleted by Ipsos I&O three months after the survey has been conducted.

RIVM and CBS also store the completed questionnaires, so that they can support the 25 GGDs and the municipality of Utrecht and carry out research at a national level. This is laid down in the agreements made by the cooperating organisations. RIVM stores the raw data for 10 years, which complies with the Public Records Act 1995 and the Open Government Act (Woo). After 10 years, RIVM destroys the data.

What are my rights?

As a participant in the study, you have a number of rights regarding the processing of your data, as detailed below. For further information on these rights, please visit the Dutch Data Protection Authority website. As explained below, these rights can no longer be exercised after 8 December 2024, because all traceable data will have been deleted by then, making it impossible to trace individual data without additional information from CBS.

Right to refuse

Participation in the GGD Health Monitor 2024 is voluntary. Participation can be waived at any time, without giving any reason. You can read more information about completing the questionnaire on the home page of the study. After that, you can decide whether or not to participate. You can also skip questions or stop filling out the questionnaire.

Right to information

You are entitled to clear information on what an organisation does with your personal data and why. This online privacy statement has been drawn up to comply with this. Do you have any further questions? The last part of this statement explains how you can ask these questions with contact details. You can also request a written version of this privacy statement.

Right of access and copies

You are entitled to access your data. Note however that a request to access your data is only possible in the data collection stage (field work) until 8 December 2024. After this first phase, all directly identifiable data is deleted, which makes it impossible to retrieve individual data without first obtaining additional data from CBS.

Right of rectification

You have the right to have data that is incorrect, or that is no longer correct, rectified. Note however that a request for rectification is only possible in the data collection stage (field work) until 8 December 2024. After this first phase, all directly identifiable data is deleted, which makes it impossible to retrieve individual data without first obtaining additional data from CBS.

Right of erasure

You may request that your personal data is erased. Note however that a request to erase your data is only possible in the data collection stage (field work) until 8 December 2024. After this first phase, all directly identifiable data is deleted, which makes it impossible to retrieve individual data without first obtaining additional data from CBS.

Right to restrict processing

In certain cases (as stipulated in the GDPR), you may request that the processing of your data is restricted. This is only possible if the data is suspected to be incorrect. A request to restrict processing is only possible in the data collection stage (field work) until 8 December 2024. After this first phase, all directly identifiable data is deleted, which makes it impossible to retrieve individual data without first obtaining additional data from CBS.

Freedom of participation and right of objection

Participation in the GGD Health Monitor 2024 is entirely voluntary, and you may refuse to participate at any time, without being required to provide a reason. You also have a formal right to objection, which you may make use of if it is justified by the individual circumstances.

Who can I contact with questions?

- Under Frequently Asked Questions you will find answers to frequently asked questions.
- If you have any questions about your rights and how to exercise them in this study, you can contact Ipsos I&O until 8 December 2024 at:
 - Whatsapp: 06-86826208
 - E-mail: NLhelpdeskGM@Ipsos.com
 - Telephone: 0800-0191 (7 days a week, 09.00-21.00)

If you submit a request regarding your rights, Ipsos I&O will need your login details in order to process the request.

If you have any questions about the study or how GGD Kennemerland handles your personal data, please contact:

Public health researcher Dirk Hoevenaars:

Email: dirk.hoevenaars@ggdkennemerland.nl

If you wish to make a complaint, please contact:

Email: klachten@vrk.nl.

Trough post: Postbus 5514, 2000 GM, Haarlem.

If you disagree with the outcome of your complaint or request or the way in which your complaint or request was handled, you may submit a complaint to the Dutch Data Protection Authority. You can do this at the following website: <https://autoriteitpersoonsgegevens.nl/nl/voordat-u-een-klacht-indient>.

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