

SPECIFIC PRIVACY STATEMENT

Pilot project related to the development of evidence based strategies to improve the health of isolated and vulnerable persons ('VulnerABLE')

Introduction

This privacy statement concerns the processing of personal data in the context of the pilot project related to the development of evidence based strategies to improve the health of isolated and vulnerable persons ('vulnerABLE'), which includes the organisation of expert meetings, capacity building workshops, and interviews.

It explains the reason for the processing, the way we collect, handle and ensure protection of all personal data provided, how that information is used and what rights you may exercise in relation to your data (the right to access, rectify, block etc.).

The European institutions are committed to protecting and respecting your privacy. As this project collects and further processes personal data, Regulation (EC) N°45/2001¹, of the European Parliament and of the Council of 18 December 2000 on the protection of individuals with regard to the processing of personal data by the Community institutions and bodies and on the free movement of such data, is applicable.

1. OBJECTIVE

This EU-funded pilot project aims to increase the understanding of how best to improve the health of people who are living in vulnerable and isolated situations in the European Union (EU). The project targets vulnerable and isolated populations from within specific target groups- children and families from disadvantaged backgrounds; those living in rural/isolated areas; those with physical, mental and learning disabilities or poor mental health; the long-term unemployed; the inactive; the 'in-work poor'; older people; victims of domestic violence and intimate partner violence; people with unstable housing situations (the homeless); and prisoners.

The project involves:

- **Interviews** with individuals and organisations who work first-hand in the field of health inequalities (such as the World Health Organisation and local authority networks);
- **Detailed research** into the health needs of people in isolated and vulnerable situations, including a face-to-face survey and in-depth focus groups with them;
- **An Expert Group** bringing together the leading thinkers in this area and enabling them to contribute to future strategies to prevent isolation and vulnerability;
- **Training materials and capacity-building workshops** for national and regional authorities who are active in delivering healthcare services and who have a vital role to play in tackling health inequalities;
- **Regular news updates, web resources, direct communication with experts and a one-day conference** to spread awareness of the project's findings amongst national and regional authorities; public health experts; health professionals; and other non-governmental organisations (NGOs).

The European Commission has concluded a Service contract (SANTE/2014/C4/034) with ICF Consulting Services Ltd. (UK), and its subcontractors: Eurohealthnet, UCL's Institute for Health Equity, The Social

1 Regulation (EC) N° 45/2001 (OJ L8 of 12/01/2001).

Platform and the European Public Health Alliance to carry out the 'VulnerABLE' project under the responsibility of the Head of Unit C4 'Health Determinants and Inequality', Directorate-General for Health and Food Safety, European Commission.

2. WHY IS PERSONAL DATA PROCESSED?

Purpose of the processing operation

Your personal data will be processed for the purposes listed below:

- **Interviews:** A series of scoping interviews were conducted with EU and national stakeholders active in the field of access to healthcare for vulnerable groups. The sessions were **recorded/transcribed** and translated (in case the discussion was in a language other than English) to collect relevant information for the research conducted.
- **Capacity Building Workshops:** Workshop discussions, meetings and interviews are conducted with national and regional authorities and other relevant stakeholders. The sessions may be **recorded/transcribed** and translated (in case the discussion is in a language other than English) to collect and analyse data regarding the quality and completeness of the research conducted and focus on building capacity in intersectoral collaboration and service design to improve health and access to health care for vulnerable people. **Identification and contact details of participants will be removed from any outputs of the project (such as recommendations, minutes and so on). Experiences reported by participants will be used in the research reports for the European Commission and/or for academic articles and presentations and any other use in line with the purposes of the project.**
- **Expert Group Meetings:** Discussions within this group focus on analysing data regarding the quality and completeness of the research conducted and on developing a policy framework to improve access to healthcare for vulnerable groups across the EU. The sessions may be **recorded** to support the analysis. Participants can opt-out of the recording and/or publication of images on legitimate grounds by contacting the data controller (see section 8 below).
- **General inquiries:** Name and e-mail addresses of data subjects submitting general inquiries, which are collected to enable us to contact the data subject about the inquiry. These data categories will also be added to a database of interest groups who will be kept informed about the project progress. Data subjects have the possibility to opt out, by specifying that they do not wish to have their details added to said database.

All information collected is used solely for the purpose for which you submitted the information to us. For example, if you contact us with a general inquiry, your information is used solely to respond to your inquiry or comment.

Lawfulness of the processing operation

The processing operations on personal data linked to the management of this project are necessary for the functioning of the Commission as mandated by the Treaties, (Articles 5 and 13 TEU and Articles 244 - 250 TFEU) and, more specifically, by the Commission Decision of 1.12.2014 concerning the adoption of a financing decision for 2014 on the pilot project 'Developing evidence based strategies to improve the health of isolated and vulnerable persons' and corresponding annex.

The processing operations on personal data for the above mentioned purposes are necessary and lawful under the following article of the Regulation (EC) 45/2001:

- Article 5 (a): processing is necessary for the performance of a task carried out in the public interest on the basis of the Treaties establishing the European Communities or other legal instruments adopted on the basis thereof;
- Article 5 (d): the data subject has unambiguously given his or her consent.

3. WHICH DATA DO WE COLLECT AND PROCESS?

Personal data collected and processed are only those data that are necessary for the management of contributions, and the views of contributors on the topics concerned. Specifically:

Information about people who participate in the workshops, meetings and interviews:

Name, Surname, profession, affiliation to an organisation, postal address, phone number, email, CV, academic titles; meetings, interviews and workshops (which will have identification and contact identification details removed, and will be aggregated in a summary for analysis); declaration of interests and bank account information for purposes of reimbursement;

Researchers' details:

The names and professional roles of researchers from the consortium partners will be documented by the contractors as active professionals working on this project.

Personal data of individuals who contact us with general enquiries:

Name, surname, profession, affiliation, postal and e-mail addresses, phone number/fax number.

4. WHO HAS ACCESS TO YOUR INFORMATION AND TO WHOM IS IT DISCLOSED?

Access to all personal data and information collected in the context of this project is only granted to a defined population of users (participants to the meeting, contractor and European Commission staff), without prejudice to a possible transmission to the bodies in charge of a monitoring or inspection task in accordance with European legislation. These users are typically members of the Unit organising the project inside the Directorate General, and the Contractors (ICF Consulting Services Ltd. (UK), Eurohealthnet (BE), UCL's Institute for Health Equity (UK), The Social Platform (BE) and the European Public Health Alliance (BE). No personal data is transmitted to parties outside of the above mentioned recipients and legal framework. The European Commission will not share personal data with third parties for direct marketing purposes.

5. HOW DO WE PROTECT AND SAFEGUARD YOUR INFORMATION?

All data in electronic format (e-mails, documents, uploaded batches of data etc.) are stored on a computer of the contractors, the operations of which abide by the European Commission's security decision of 16 August 2006 [C(2006) 3602] concerning the security of information systems used by the European Commission.

Paper versions of the documents containing personal data are stored in secure places, under the control of the contractors. The Commission's contractors are bound by a specific contractual clause for any processing operations of your data on behalf of the Commission.

The contractor shall erase all information, including personal data, after the necessary data has been transferred to the European Commission and no further follow-up is required. This should happen at the latest 6 months after the project ends.

6. WHAT ARE YOUR RIGHTS AND HOW CAN YOU EXERCISE THEM?

According to Regulation (EC) n°45/2001, you are entitled to access your personal data and rectify, block, object to, or delete it in case the data is inaccurate or incomplete. You are also entitled to withdraw your consent, should you have provided it, at any time and without any adverse effects. You can exercise your rights by contacting the data controller or, in case of conflict, the European Commission Data Protection Officer and, if necessary, the European Data Protection Supervisor, using the contact information given at point 8 below.

7. HOW LONG DO WE KEEP YOUR DATA?

Your personal data will remain in the Commission database until the results of the project have been completely analysed and usefully exploited and are no longer necessary. Concerning surveys, personal data are kept as long as follow-up actions to the surveys are necessary with regard to the purposes for which the data were collected and further processed. Concerning workshops and meetings, personal data is kept as long as follow-up actions to the meetings are necessary. Personal data will be deleted, at the latest, 10 years after the last action based on the contract in the framework of which the project activities were conducted. Reports containing personal data will be archived according to the Commission's legal framework. As mentioned in point 5 above, the contractor shall erase all information, including personal data, after the necessary data has been transferred to the European Commission and no further follow-up is required. This should happen at the latest 6 months after the project ends.

Nevertheless, where needed, after this delay, personal data will be part of a list of contact details shared internally amongst the European Commission services for the purpose of contacting data subjects in the future in the context of the Commission's activities. If data subjects do not agree with this processing of their personal data, they may contact the Controller by using the Contact Information as mentioned in section 8 of this Privacy statement.

8. CONTACT INFORMATION

If you have comments or questions, any concerns or a complaint regarding the collection and use of your personal data, please feel free to contact the Contractor using the following contact information:

- Mailbox address: Christina.Dziewanska-Stringer@icf.com
- Phone number: +32 (0) 2 275 01 00

or the Data Controller using the following contact information:

The Data Controller:

- Directorate-General Health and Food Safety, Head of Unit C4 'Health determinants and inequality'
- Phone number: 00352-4301 34658
- Mailbox address: SANTE-CONSULT-C4@ec.europa.eu

The Data Protection Officer (DPO) of the Commission: DATA-PROTECTION-OFFICER@ec.europa.eu

The European Data Protection Supervisor (EDPS): edps@edps.europa.eu.

9. WHERE TO FIND MORE DETAILED INFORMATION?

The Commission Data Protection Officer publishes the register of all operations processing personal data. You can access the register on the following link: <http://ec.europa.eu/dpo-register>