

(To be filled out in the EDPS' office)
REGISTER NUMBER: 1388

(To be filled out in the EDPS' office)

NOTIFICATION FOR PRIOR CHECKING

DATE OF SUBMISSION: 01/09/2016

CASE NUMBER: 2016-0759

INSTITUTION: ECDC

LEGAL BASIS: ARTICLE 27-5 OF THE REGULATION CE N° 45/2001⁽¹⁾

INFORMATION TO BE GIVEN²

1/ NAME AND ADDRESS OF THE CONTROLLER

Denis Coulombier, Head of Unit SRS, Tomtebodavagen 11 A SE 17183 Stockholm,
denis.coulombier@ecdc.europa.eu

2/ ORGANISATIONAL PARTS OF THE INSTITUTION OR BODY ENTRUSTED WITH THE PROCESSING OF PERSONAL DATA

Epidemic intelligence and response section (SRS)

3/ NAME OF THE PROCESSING

Reproduce analysis of a published outbreak report, using case and potential source locations from a Legionnaires' disease outbreak in Sarpsborg Norway, from 2005.

(link to publication: <http://cid.oxfordjournals.org/content/46/1/61.full>)

¹ OJ L 8, 12.01.2001.

² **Please attach all necessary backup documents**

4/ PURPOSE OR PURPOSES OF THE PROCESSING

To compare the results of a Legionnaires' disease GIS (Geographic information system) tool, built by ECDC, with the published outbreak investigation results of Norwegian investigators, as a way to validate the tool accuracy. The tool aims to allow epidemiologists to do basic spatial analysis during Legionnaires' disease outbreaks. Furthermore, the data will be used to support the formulation of future requirements for further development of the tool.

5/ DESCRIPTION OF THE CATEGORY OR CATEGORIES OF DATA SUBJECTS

Data collected might potentially refer to personal data of Legionnaire's disease patients.

6/ DESCRIPTION OF THE DATA OR CATEGORIES OF DATA (*including, if applicable, special categories of data (Article 10) and/or origin of data*).

The following data related to the Legionnaire's disease outbreak in Sarpsborg of 2005 is processed:

case locations (latitude-longitude coordinates in decimal degrees), company A to H locations (latitude-longitude coordinates in decimal degrees), population density of the outbreak area at the time of the outbreak analysis (raster-grid), data used to reconstruct (model) the aerosol emission (plume) from an industrial air-treatment plant.

Only data from the outbreak in Sarpsborg of 2005 is processed (i.e. no data from other outbreaks).

7/ INFORMATION TO BE GIVEN TO DATA SUBJECTS

N/A. ECDC is not in position to identify the patients.

8/ PROCEDURES TO GRANT RIGHTS OF DATA SUBJECTS

The Controller may be contacted at any time by the data subjects for exercising the right of access, to rectify, to block, to erase and to object to the processing of data. However, as the Controller is not aware of the identity of the data subject, any request should be addressed through the provider of the data (Norwegian authorities).

The Controller plans to include a notice in the webpage where the tool is hosted informing that since there are no instances in which persons can be uniquely identified from data held by the tool, requests from these data subjects will be referred to the data source (Norwegian authorities), who may be able to retrieve the information.

9/ AUTOMATED / MANUAL PROCESSING OPERATION

Processing of data is manual, intended to form part of a filing system.

10/ STORAGE MEDIA OF DATA

Data is inserted by ECDC staff in the web-based ECDC-hosted tool. After testing that the tool gives the expected output (map and table similar as in the publication), ECDC will delete the data.

11/ LEGAL BASIS AND LAWFULNESS OF THE PROCESSING OPERATION

Legal basis (Treaty, Regulation, Decision, etc.) for this processing operation are:
- ECDC Founding Regulation 851/2004

12/ THE RECIPIENTS OR CATEGORIES OF RECIPIENT TO WHOM THE DATA MIGHT BE DISCLOSED

Data might be accessible to staff within the SRS unit with the purpose of testing the tool. ECDC will present the tool at a Legionella conference in September 2016, Amsterdam (ESGLI) and will explain that the tool was validated by reproducing the results of an old outbreak in Norway, 2005.

13/ RETENTION POLICY OF (CATEGORIES OF) PERSONAL DATA

Data shall be deleted as soon as the testing of the tool is finished, and in any case not later than December 2017.

13 A/ TIME LIMIT TO BLOCK/ERASE ON JUSTIFIED LEGITIMATE REQUEST FROM THE DATA SUBJECTS

N/A

14/ HISTORICAL, STATISTICAL OR SCIENTIFIC PURPOSES

N/A

15/ PROPOSED TRANSFERS OF DATA TO THIRD COUNTRIES OR INTERNATIONAL ORGANISATIONS

No transfer of data is envisaged.

16/ THE PROCESSING OPERATION PRESENTS SPECIFIC RISK WHICH JUSTIFIES PRIOR CHECKING (*Please describe*):

The combination of data collected could in theory be used to identify individuals providing historical information on their health. However, in practice, further information that is not in possession of ECDC would be needed to make possible the identification of the data subject.

AS FORESEEN IN:

1 Article 27.2.(a) X

Processing of data relating to health and to suspected offences, offences, criminal convictions or security measures,

1 Article 27.2.(b)

Processing operations intended to evaluate personal aspects relating to the data subject,

1 Article 27.2.(c)

Processing operations allowing linkages not provided for pursuant to national or Community legislation between data processed for different purposes,

1 Article 27.2.(d)

Processing operations for the purpose of excluding individuals from a right, benefit or contract,

1 Other (general concept in Article 27.1)

17/ COMMENTS

PLACE AND DATE:

DATA PROTECTION OFFICER:

INSTITUTION OR BODY: