

## DPO-3777.1 - SANTE : EU Health Policy Forum

### General information

**Creation :** 01/04/2015

**Last updated :** 10/04/2015

**Registration :** Not yet registered

**Status :** Acceptance

**Deleted :** No

**DG.Unit :** SANTE.DDG1.C.4

**Controller :** ROUX Philippe

**Delegate :** HORKA Hana

**DPC :** GANGUZZA Cristina, GARREAUD Catherine

**Keywords :**

**Corporate :** No

**Language :** English

**Model :** No Model

**EDPS opinion (prior check) :** No

**Target Population :**

**DPC Notes :**

### Processing

#### 1 . Name of the processing

EU Health Policy Forum

#### 2 . Description

The Health Policy Forum is an IT platform consisting of two parts: a webpage with public access and a social network platform which will entail multilateral communication with registered access. The webpage will be linked to the Public Health Website and will offer information on the Health Policy Forum, the registered stakeholders, events, best practices, news, stakeholders groups, live tweets, a public section of the forum (newsfeed with public posts) and highlights of the week. When clicking on the Forum tab, present in the Health Policy Forum webpage, stakeholders will be directed to a social network platform where after registration (via European Commission Authentication Service-ECAS) they will belong to a general network ("Health Policy Forum network") and then, upon request, to other specific different networks according to their needs and field of expertise. Each network will have a newsfeed where stakeholders can post items (videos, links or documents) with different degrees of restriction (public, to all networks, only to my network). They will be able to comment on posts and discuss new ideas. Each network will be able to exchange and store documents, promote and participate in events, create opinion polls, start a discussion and request access to another network. During the pilot phase the platform will start with a limited number of networks: the general "Health Policy Forum network" and the others focusing on specific areas: EU Platform on Diet, Physical Activity and Health network, High Level Group on Nutrition and Physical Activity network, the Cancer Control network, the Expert Group on Social Determinants and Health Inequalities, HIV/AIDS Think Tank network, the Civil Society Forum network, the European Alcohol and Health Forum network, the Committee on National Alcohol Policy and Action network and the Expert Group on Mental Health and Wellbeing network. According to the experience with these, more networks could be created in due time and according to DG Health and Food Safety and stakeholders' needs. In conclusion, the social network IT platform with registered access contains:

1. A general network (Health Policy Forum network) where all stakeholders (EU and national) have direct access and participate in discussions.
2. Networks for the nine existing stakeholder and expert groups (mentioned above). These networks are private and only accessible to the stakeholder/expert group members of the policy file and allow the preparation of the regular stakeholder/expert group meetings and ensure the continuity of discussion between meetings.
3. A knowledge hub, where each network have a library of documents, papers, good practices, health promotion initiatives, conference papers and also links to existing information on other websites. All exchange of information done in the platform will be validated a posteriori by a moderator from the Commission services (intra-muros). The specific groups will be managed and moderated by the policy officers in charge of the file).

No personal data is processed which falls under Article 27 "Prior checking" of Regulation (EC) No 45/2001.

### 3 . Processors

### 4 . Automated / Manual operations

Visitors of the website will be prompted to **register** to the Health Policy Forum. They can do so by obtaining an ECAS account. Once they have an ECAS account they can go to Forum login page in the website and enter the general part common to all Networks. Then they can request to be member to a specific Network, the request being sent and validated by the Commission through the SAAS authorisation system.

### 5 . Storage

Electronic

### 6 . Comments

N/A

## Purpose & legal basis

### 7 . Purposes

The purpose of the processing through registration is to allow the stakeholders to better communicate with the Commission services and with each other and disseminate their views within the specific network they belong to and to be informed about events and information relevant to Health in all policies through the Health Policy Forum general network.

## 8 . Legal basis and Lawfulness

Article 11 of the consolidated European Treaty on the European Union stating: “The institutions shall, by appropriate means, give citizens and representative associations the opportunity to make known and publicly exchange their views in all areas of Union action. The institutions shall maintain an open, transparent and regular dialogue with representative associations and civil society”.  
Health Programme 2014-2020 ([http://ec.europa.eu/health/programme/policy/index\\_en.htm](http://ec.europa.eu/health/programme/policy/index_en.htm))  
In the Annual Work Plan for 2014 is stated an action on the Health Policy Forum: [http://ec.europa.eu/health/programme/docs/wp2014\\_annex\\_en.pdf](http://ec.europa.eu/health/programme/docs/wp2014_annex_en.pdf) (page 29).  
Lawfulness is based on Regulation Article 5(a): the tasks are carried out in the public interest; Article 5(b): processing is necessary for compliance with a legal obligation to which the controller is subject; Article 5(d): the data subject has unambiguously given his or her consent.

## Data subjects and Data Fields

### 9 . Data subjects

The data subjects concerned are potentially all stakeholders involved in health policy.

### 10 . Data fields / Category

The data fields are the personal data required in order to sign up to ECAS: e-mail address, first name, last name, username.

The e-mail address will only be visible for the system administrator.

For the registration via SAAS further optional personal data may be registered: title, department, free phone, gen phone, fax, language, address, zip, city, country.

Furthermore, each stakeholder member of a network will be able to create a profile by entering, at his choice, the following personal data: name, surname, picture, location, specialities, email addresses (personal and professional ones), phone number, skype address, memberships in the networks, organisation he/she belongs to. These data published on his/her profile will be visible to all stakeholders registered in the Health Policy Form network. No data fields concern racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, health or sex life.

The discussions in the group will never be related to a specific individual health-data. In the Health Policy Forum there will be recommendations specifying that the discussions should never reveal health-related data of individuals. The Forums will discuss studies, projects, policies...related to the topic.

## Rights of Data Subject

### 11 . Mandatory Information

ECAS (Notification DPO-839.2) is used to authenticate users of Health Policy Forum network and SAAS (Notification DPO-2065.3) to authorize them to become members of the specific networks. A specific privacy statement for Health Policy Forum users is not required as the users will already be informed about their rights through ECAS and SAAS privacy statements, published in the webpages of the systems. Both systems enables the users to have full control over their personal information, whether to correct, update or delete their data, by contacting the controller through the contact specified in the specific privacy statements. Please note that in order to delete a profile, the users need to send an email to ECAS system contact point. Two months after the deletion from ECAS of the user profile, the personal data will also be deleted from SAAS, thus an e-mail to SAAS contact point is only needed if the user desires its personal data be deleted before this two-month period.

[List of attachments](#)

- [Privacy statement for the Identity Management Service.doc](#)
- [Privacy statement SAAS 2015.doc](#)

### 12 . Procedure to grant rights

Data Subjects will be entitled to access, verify, correct their Personal Data any time within ECAS. For SAAS the users have to contact the administrator in order to exert their rights. The registered users can also modify and erase their comments posted on the network they belong to or in the Health Policy Forum network common to all networks. The registered members are also able to verify, correct or delete the personal data they inserted in their profiles.

### 13 . Retention

Personal data recorded through ECAS are retained for the duration foreseen by the system. In particular, the Identity Management Service keeps the data for as long as the person is recorded as an active user and for a period of one year thereafter. After two months after the deletion from ECAS of the user profile, personal data will be also deleted by SAAS. For the data in SAAS, once a person is removed from any access to any DG SANTE system, the data will not be kept longer than one month after the initial date of deletion.

### 14 . Time limit

The time limit is usually one working day and in any case no longer than 15 days.

### 15 . Historical purposes

N/A

## Recipients

### 16 . Recipients

If a registered person requires to have its post published in the Health Policy Forum webpage., the general public will be able to see his/her name, picture and organization. However, after the request from the stakeholder, the moderator will consider if the information/post is relevant enough to be shared publicly in the internet via the webpage of the Health Policy Forum. Otherwise only the members of the Health Policy Forum social network platform common to all Networks will be able to read the comments and the personal data related to the post (first name and family name of the contributor, picture and organisation), depending if the person chose to make the post visible to the whole Forum community or only to the Network he/she belongs to. All the registered members of the Health policy Forum network will be able to see the personal data published by a member under his/her profile.

### 17 . Transfer out of UE/EEA

If personal data are published on a publicly available website this means that they are accessible worldwide. Following the opinion of the EDPS of 13/02/2007, this does not constitute a transfer of personal data under Art. 9 of Regulation 45/2001. The participants have to be aware of such a publication and the opportunity has to be given to them to opt out on legitimate grounds. No data in the forum is put on the web without the subject's consent. The subject must explicitly ask to make content (together with their name) visible through the web.

## Security measures

### 18 . Technical and organizational measures

Identity protection is assured by the ECAS system. The data is protected within DIGIT's data centre. Outside ECAS, the only people who have access to personal data are the system administrators. For SAAS, the data is managed from the internal network by Commission officials or contractors having signed a confidentiality agreement. Access is managed based on roles that are defined for the different categories of users administering the data. The general system of protection of the computer and telecommunications of the European Commission applies.

### 19 . Complementary information

N/A