

Updated: 25-08-2023

Information about processing of personal data for participants in Virus Monitoring in Denmark

Statens Serum Institut (SSI) processes personal data about you when you participate in Virus Monitoring at Work. **Please note that you decide if you want to participate in the monitoring, but your participation is binding in the sense that you are not entitled to have the data that you send to us deleted for as long as our processing purpose for those data remains legal. You can, however, always discontinue any future participation and stop sending information to the SSI.**

1. We are the data controller - How to contact us?

The SSI serves as the data controller for the personal data we process about you. You can read more about how you may contact the SSI and about our data protection officer under point 11 below.

2. The reasons why we process your personal data

We process your personal data to monitor the development of SARS-CoV-2, influenza virus A and B (influenza virus) and respiratory syncytial virus (RSV) in the Danish population.

If you decide to participate in the monitoring, you will be asked to self-test when you experience symptoms. You will be asked to log in to our web app where you can sign up to participate in the monitoring, register your sample and answer a simple questionnaire. Every single sampling made and questionnaire answer given is voluntary.

When the SSI receives your sample, it will be registered and analysed in our laboratory, and you will receive the test result in the web app. The test result will not trigger a corona passport or be sent directly to your general practitioner. However, your general practitioner will be able to look up your test result via e.g. the healthcare portal (Sundhedsportalen, sundhed.dk).

Please read [here](#) to learn more about how you should react if your test is positive.

Personal data, including your test result, virus sequence and questionnaire data, will form part of the SSI's common monitoring of SARS-CoV-2, influenza virus and RSV. The data may also be used for statistical and scientific studies, including for research purposes.

Any residual materials are stored in freezers at the SSI, who may perform new analyses as needed. Furthermore, residual material will be stored at the SSI for use in future statistical and scientific studies.

To learn more about the SSI's monitoring task and how personal data are processed in connection with this task, please visit the section on their website "[Have you been tested for, or have you had a disease that the SSI is tasked with monitoring, preventing and fighting?](#)"

If you have given your consent and have provided your email SSI will notify you via email when there is new information in the app, including when your test answer is ready.

If you have given your consent SSI will contact you via Digital Post to obtain any feedback you may have about your participation, including your use of the web app.

3. Personal data categories

We process data about you when you participate in the monitoring project:

- Civil registration number (CPR number):
- Items of information relating to NemID/MitID: Your PID or UUID number (a number which can be “translated” into your CPR number)
- IP address and user agent from your mobile unit
- Name
- Email (if you decide to state your email)
- Age
- Sex
- Address
- Whether you have a withheld name and address
- Your registration for this project
- If you are a parent or guardian
- Symptoms
- Test type
- Which worksite you received the test kit from
- Time for the scanning of the test
- Analysis code, which states that you have participated in the monitoring scheme
- The biological sample
- Negative test result
- Positive test result, including if you have become infected with SARS-CoV-2, influenza virus or RSV (healthcare data)
- Virus sequences

As part of our common monitoring of SARS-CoV-2, influenza virus and RSV, the SSI will, among others, link your test result, your CPR number and analysis code to other available information that we have access to. This may include data from the National Patient Register and other relevant registers.

4. The legal basis for the Danish Health Data Authority’s processing of your personal data

The legal basis for the SSI’s processing of your personal data is Article 6(1e) of the General Data Protection Regulation (1) as the processing is needed to complete a task that forms part of exercise of public authority placed with the SSI in pursuance of Section 222 of the Danish Healthcare Act (2).

The legal basis for processing of sensitive personal data is Article 9(2g, i) of the General Data Protection Regulation and Section 222, Sub-section 1, of the Danish Healthcare Act as the processing is necessary in pursuance of substantial public interests and public health interests.

The legal basis for the SSI's processing of your CPR number is provided in Section 11, Sub-section 1, of the Danish Data Protection Act (3) as the processing is needed to identify you unambiguously.

Additionally, we may process your data to perform statistical or scientific studies of substantial social importance. The legal basis therefore is Article 6(1e) of the General Data Protection Regulation and Section 10 of the Danish Data Protection Act.

5. Recipients or categories of recipients

When the SSI has analysed your sample, the test result is made available in the app. The test result will generally in the longer term also be recorded in the Danish Microbiology Database (MiBa), which is a nationwide, automatically updated database of microbiological test results. In these cases, healthcare professionals will be able to look up your test result in the MiBa or via the healthcare portal (Sundhedsportalen, sundhed.dk) if this is relevant when treating you.

The SSI uploads additional information about virus sequences from positive COVID-19 samples to internationally acknowledged databases, including the GISAID database. The objective of uploading these items of information is mainly to facilitate global monitoring and research related hereto. The legal basis for uploading the data is provided in Executive Order no. 777 of 29 April 2021 on Statens Serum Institut's Passing On of Gene Sequences and Isolates from Micro-organisms and Associated Personal Data in Connection with the Prevention of and Fight Against the Spread of Infectious Diseases.

When needed in pursuance of the SSI's exercise of authority tasks and legal data protection provisions, the SSI may pass on your personal data to others, including to the central health authorities.

Furthermore, the SSI passes on your personal data to our data processors, who operate and provide support for the SSI's web app and remaining systems. The SSI has entered into data processing agreements with data processors and supervise that they observe the data processing agreements in accordance with relevant current provisions.

If you take part in the project via your (or a household member's) workplace, educational institution or similar, SSI will also pass on statistics to the individual workplace, educational institution etc. The statistics will only concern information about how many samples SSI has received from each location, as well as how many of these samples are positive. The statistics will be anonymous.

6. Where your data come from

We collect information directly from you when you use the testing app, among others when you register your test and answer the questionnaire. We also process information about you when we receive a test from you.

Children aged 5-14 can be enrolled by a parent or guardian. In this case, we receive information from the parent or guardian

Additionally, we collect data on you by performing look-ups in basic data registries of the Danish Health Data Authority, including data from the CPR and the National Patient Registry. Finally, we receive data about you from the Danish Agency for Digital Government when you log in using NemID/MitID.

7. Personal data storage

All data that we process about you related to your sample and your answers to the questionnaire are deleted in the app after 180 days. If you have provided your phone number, this is deleted after 180 days of inactivity.

The SSI will store data related to the sample in our monitoring systems until these data are no longer required to perform the tasks of the SSI, including to monitor infection with SARS-CoV-2, influenza virus and RSV, and to make the test result available as part of your healthcare record.

Residual material from your test will be stored at the SSI to monitor the spread of COVID-2, influenza virus and RSV. Your test will be stored as long as the SSI needs it to comply with its regulatory tasks. When the material is no longer of statistical or scientific value, it will be destroyed. We do not hand out the biological material for research if you have signed up for the Danish Tissue Use Register. You can read more about the Danish Tissue Use Register [here](#).

Finally, we note that temporary storage of the personal data registered in the app occurs on your mobile unit. These data are stored in a browser until the session completes successfully. The data are not stored if the session is cancelled or remains inactive for more than 30 min.

8. Your rights

In pursuance of the General Data Protection Regulation, you have various rights in relation to our processing of data about you. If you would like to exercise those rights, please contact us.

You can see how to contact us under point 11 below.

Please note that some exceptions may apply to your rights. You will, for example, not be entitled to access data that are processed only for scientific and statistical purposes.

Right of data access

You have a right to access the information that we process about you and various other data.

The right to rectify data errors

You have a right to have incorrect data about you corrected.

The right to have data deleted

In special cases, you have a right to have data deleted about you before the normal time of deletion occurs. The SSI generally always accommodates requests to have biological material destroyed. The SSI will inform you again if we again store biological material from you at the SSI after you have had your samples destroyed.

The right to limit data processing

In some cases, you have a right to have the processing of your personal data limited. If you are entitled to have data processing limited, in future we may only process the data - apart from storage - with your consent or to establish, defend or execute a legal claim, or to protect a person or vital societal interests.

The right to object

In some cases, you have a right to object to our - otherwise legal - processing of your personal data.

You can read more about your rights in the Danish Data Protection Agency's guideline on the rights of persons about whom data have been registered, which you will find [here](#).

9. Lodging a complaint with the Danish Data Protection Agency

You are entitled to lodge a complaint with the Danish Data Protection Agency if you are dissatisfied with our processing of your personal data. You will find the contact information of the Danish Data Protection Agency [here](#).

10. The contact information of the SSI and our data protection officer

If you have any questions relating to how the SSI processes personal data about you, feel free to contact our section on Data Protection and Data Safety at ssidatabeskyttelse@ssi.dk or by phone at: 4046 0083. The phones are open Tuesday and Thursday from 09.00 to 15.00.

If you have questions relating to your rights, you need to contact the SSI by Digital Post. You can learn more about using Digital Post [here](#).

Furthermore, the physical address and the general contact information of the SSI are as follows:

Phone: 3268 3268

E-mail: serum@ssi.dk

By letter: Artillerivej 5, 2300 Copenhagen S, CVR no.: 46837428

You may contact our data protection officer in the following ways:

By e-mail: databeskyttelse@sum.dk

By digital mail: Please select the Danish Health Ministry (Indenrigs- og Sundhedsministeriet) as your recipient and state "Att.: Data Protection Officer" in the Subject field

By letter: Holbergsgade 6, 1057 Copenhagen K, att. "Data Protection Officer"

For more information about contacting the joint corporate DPO, please read [here](#).

(1) Decision no. 679 of 27 April 2016 on Protection of Physical Individuals with Regard to Processing of Personal data and Free Exchange of Such Data and Rescinding of Directive 95/46/EF (General Data Protection Regulation)

(2) Consolidated Act no. 210 of 27 January 2022 (the Danish Health Act)

(3) Act no. 502 of 23 April 2018 on Supplementary Provisions for Executive Order on Protection of Physical Individuals with Regard to Processing of Personal data and Free Exchange of Such Data (the Danish Data Protection Act)