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Information about the processing of personal data for persons participating in Virus Monitoring in Denmark

Statens Serum Institut (SSI) processes personal data about you when you participate in the random monitoring of respiratory tract infections. **Please note that your participation in the monitoring is voluntary, but that your participation is binding in the sense that you do not have the right to have the data you submit to us deleted as long as we have a lawful purpose for processing such data. You may, however, withdraw from participation at any time and stop submitting new data to SSI.**

1. We are the data controller – how do you contact us?

SSI is the data controller of the personal data we process about you. You can read more about how to contact SSI and our Data Protection Officer in section 10 below.

2. Purpose of processing your personal data

We process your personal data for the purpose of monitoring the development of the following respiratory tract infections:

- SARS-CoV-2 (COVID-19)
- Influenza virus (A and B)
- RS virus (A and B)
- Parainfluenza virus (1, 2, 3 and 4)
- Other coronaviruses (229E, OC43, NL63 and HKU1)
- Metapneumovirus
- Rhinovirus/enterovirus
- Adenovirus

The viruses typically cause cold symptoms. If you choose to participate in the monitoring, you will be asked to do a self-test when you experience symptoms. You will need to log in to our web app, where you can sign up for the monitoring, register your test and answer a symptom questionnaire. Testing and answering the questionnaire is voluntary.

When SSI receives your test, it is registered and analysed in our laboratory, and you will receive the test result in the web app. The test result will neither trigger a corona passport nor be sent directly to your doctor. However, your doctor will be able to look up the test result on, e.g., the eHealth Portal (Sundhed.dk).

You can read [here](#) what to do if your test is positive.



Your personal data, including the test result, virus sequence and questionnaire data, will be included in SSI's general monitoring of the viruses mentioned above. The data may also be used for statistical and scientific studies, including for research purposes.

The residual material from all tests will be stored in freezers at SSI, which will allow SSI to perform a new analysis if needed. In addition, residual material from the tests will be stored at SSI for statistical and scientific studies.

Read more about SSI's monitoring and how SSI processes personal data in this connection [here](#), under the tab '*Er du blevet testet for, eller har du haft en sygdom, som SSI har til opgave at monitorere, forebygge og bekæmpe?*' (*Have you been tested for, or have you had a disease that SSI is tasked with monitoring, preventing and combatting?*).

SSI will notify you by email whenever there is new information in the app, including when your test result is ready, if you have consented to this and provided your email address.

SSI will contact you via Digital Post to receive your feedback regarding your participation, including your use of the web app, if you have consented to this.

3. Categories of personal data

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

- Civil registration (CPR) number
- NemID/MitID data: Your PID or UUID number (a number that can be 'translated' into your civil registration number)
- IP address and user agent of your mobile device
- Name
- Email (if you choose to provide this)
- Age
- Sex
- Address
- Whether you have registered for non-disclosure of name and address
- That you are enrolled in the project
- Custody of children, if any
- Symptoms
- Which location you ordered a test kit from
- Test type
- Time of test scan
- Analysis code indicating that you participated in the monitoring
- Biological test
- Negative test result
- Positive test result (health data)
- Data related to the virus(es) you have been infected with

As part of its general monitoring of the viruses mentioned above, SSI will, among other things, link the test result, CPR number and analysis code to other data available to us.



This may, for example, be data from the Danish National Patient Register (*Landspatientregistret*) and other relevant registers.

4. Legal basis for processing your personal data

We process your personal data on the basis of Article 6(1)(e) of the General Data Protection Regulation⁽¹⁾, as the processing is necessary for the performance of a task carried out in the exercise of the official authority vested in SSI under section 222 of the Danish Health Act (*Sundhedsloven*)⁽²⁾.

The processing of sensitive personal data is based on Article 9(2)(g) and (i) of the General Data Protection Regulation, see section 222(1) of the Danish Health Act, as the processing is necessary for reasons of substantial public interest and public interest in the area of public health.

We process your CPR number in accordance with section 11(1) of the Danish Data Protection Act (*Databeskyttelsesloven*)⁽³⁾, as the processing is necessary to ensure unique identification.

In addition, we may process your data when carrying out statistical or scientific studies of significant societal importance on the basis of Article 6(1)(e) of the General Data Protection Regulation and section 10 of the Danish Data Protection Act.

5. Recipients or categories of recipients

Once SSI has analysed your test, the test result is made available in the web app. The test result will also be registered in the Danish microbiology database (MiBa), which is a nationwide database of microbiological test results that is updated automatically. If relevant for your treatment, healthcare professionals will be able to look up the test result in the MiBa database or on the eHealth Portal.

SSI also uploads data about virus sequences from positive tests to internationally recognised databases, including GISAID. The purpose of uploading the data is, in particular, to enable global monitoring and related research. The upload is based on Executive Order no. 777 of 29 April 2021 on Statens Serum Institut's disclosure of gene sequences and isolates from microorganisms and related personal data in connection with preventing and combatting the spread of infectious diseases (*Bekendtgørelse nr. 777 af 29. april 2021 om Statens Serum Instituts videregivelse af gensekvenser og isolater fra mikroorganismer og tilknyttede personoplysninger i forbindelse med forebyggelse og bekæmpelse af udbredelsen af smitsomme sygdomme*).

If necessary for the performance of its regulatory tasks and generally in accordance with the data protection rules, SSI may disclose personal data to others, including the central health authorities.

SSI also discloses your personal data to our data processors, who handle operation and support of SSI's web app and other systems. SSI has entered into data processing agreements with our data processors and supervises the data processors' compliance with the data processing agreements in accordance with the applicable rules.



If you participate 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 show only information about how many tests SSI has received from each location, as well as how many of these tests are positive. The statistics will be anonymous.

6. Sources of your personal data

We collect data directly from you when you use the web app, including when you register your or your child's test and answer the questions about symptoms. We also process data about you when we receive a test from you or your child.

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

We also collect data about you via lookups in master data registers with the Danish Health Data Authority, including the CPR Register and the Danish National Patient Register. Furthermore, we also receive data about you from the Danish Agency for Digital Government when you log on with your MitID.

7. Storage of your personal data

All data that we process about you related to your test and questionnaire responses will be deleted in the app after 180 days. If you have chosen to enter your phone number, it will be deleted after 180 days of inactivity.

SSI will store data related to your test in our monitoring systems until the data are no longer needed for the performance of our tasks, including our monitoring of infection with the viruses mentioned above and the inclusion of the test result in your health records.

Residual material from your test will be stored at SSI for the purpose of monitoring the spread of the aforementioned respiratory viruses for as long as required within the scope of the SSI's regulatory task. When the material no longer has statistical or scientific value, it will be destroyed. We do not make the biological material available for research if you are registered in the National Database of Non-Consent to the Use of Tissue Samples for Scientific Purposes (*Vævsanvendelsesregistret*). You can read more about the National Database [here](#).

Please note that the personal data registered in the app are stored temporarily on your mobile device. The data are stored in a browser until the session is successfully completed. The data are not stored if the session is cancelled or in case of inactivity for more than 30 minutes.

8. Your rights

Under the General Data Protection Regulation, you have a number of rights in relation to our processing of your data. Please contact us to exercise your rights. You can see how to contact us under section 10 below.

Please note that a number of exceptions may apply to your rights. For example, you do not have the right to access data processed solely for scientific and statistical purposes.



Right to access data (right of access)

You have a right to see the data we process about you as well as other additional information.

Right to rectification (correction)

You have the right to have inaccurate data about you corrected.

Right to erasure

In exceptional cases, you have the right to have data about you erased before we normally erase such data. As a general rule, SSI always accepts a request for destruction of biological material. SSI will notify you again if, after you have had tests destroyed, SSI begins storing biological material from you again.

Right to restriction of processing

In some cases, you have a right for the processing of your personal data to be restricted. If you have the right to restriction of our processing, this means that, in future, we may only process the data – with the exception of storage – with your consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest.

Right to object

In certain cases, you have the right to object to our otherwise lawful processing of your personal data.

You can read more about your rights in the Danish Data Protection Agency's guide on the rights of data subjects, which you can find [here](#).

9. Filing a complaint with the Danish Data Protection Agency

You have the right to file a complaint with the Danish Data Protection Agency if you are dissatisfied with the way we process your personal data. You will find the Danish Data Protection Agency's contact information [here](#).

10. Contact information for SSI and our Data Protection Officer

If you have any questions about how SSI processes personal data about you, you are welcome to contact our Data Protection & Information Security department at ssidata-beskyttelse@ssi.dk or on tel. +45 4046 0083. You can call us on Tuesdays and Thursdays at 9:00-15:00.

Please contact us via Digital Post if you have any questions regarding your rights. You can read more about how to use Digital Post [here](#).

In addition, SSI's physical address and general contact information are as follows:

Telephone: +45 3268 3268

Email: serum@ssi.dk



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

You can contact our Data Protection Officer in the following ways:

By email: databeskyttelse@sum.dk

By Digital Post: Please select the Ministry of the Interior and Health as the recipient and write 'Attn: Data Protection Officer' in the subject line

By letter: Holbergsgade 6, DK-1057 Copenhagen K, attn. 'Data Protection Officer'

You can read more about how to contact the joint Data Protection Officer [here](#).

(1) Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) (Text with EEA relevance)

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

(3) Act no. 502 of 23 May 2018 on supplementary rules to the Regulation on protection of natural persons in connection with the processing of personal data and the free exchange of such data (the Danish Data Protection Act).