

# Malta COVID-19 Vaccine Public Form

## Privacy Policy

This Privacy Policy explains what data is being processed when using the COVID-19 Vaccine Public Form and the data subject's rights under data protection law.

### 1. Provider of the COVID-19 Vaccine Public Form

The COVID-19 Vaccine Public Form is being provided by the Director General, Healthcare Services who is also the Data Controller. Under the data protection law, the Data Controller is responsible for the processing of the data. The Data Controller may be contacted at:

Address: Mr Clarence Pace  
Director General Healthcare Services,  
15, Triq il-Merkanti  
Valletta, VLT 1171

Contact number: 145  
e-mail: covid-vaccine@gov.mt

The Data Protection Officer may be contacted on the following e-mail address: [dpo.hcs@gov.mt](mailto:dpo.hcs@gov.mt)

### 2. Legal basis

The processing of personal data is governed by data protection legislation, including the General Data Protection Regulation (EU) 2016/679 (GDPR) and Data Protection Act (Cap 586 in the Laws of Malta). This App is also based on Legal Notice 49 of 2021.

The GDPR lays down rules regarding lawfulness, proportionality and necessity. The provisions stipulate that the processing of personal data is permitted when 'necessary' for certain specified purposes.

When EU public authorities provide a service based on a mandate assigned by and in line with requirements laid down by law, the most relevant legal basis for the processing, with regarding to personal data, is the necessity for the performance of a task in the public interest, in accordance with Article 6(1)(e) GDPR and other Laws of Malta.

### **3. Purposes**

The data is used for the purpose of providing the opportunity to Data Subjects residing in Malta, to register interest to be given an appointment to take the Covid-19 vaccine. While the population is being encouraged to take the Vaccine, it is not an obligatory action. The Data Controller collects only that data which is strictly necessary in relation to the purposes for which the data will be processed. Data collected will be shared in automated format with the Vaccine Registration System (VRS) that manages vaccine appointment allocation and the sms notification provider that will send sms verification code and notification.

Aggregated data may be used for statistical and scientific research purposes.

### **4. The Collection and Processing of Personal Data**

The COVID-19 Vaccine Online Registration Form is a new process which offers Data Subjects residing in Malta the opportunity to register interest to book a Covid-19 vaccine appointment with the Ministry for Health. The data is shared through an automated process with the Vaccine Registration System (VRS), which is responsible for the booking and registration of Covid-19 vaccine appointments. On confirmation of available appointment, VRS will assign an appointment based on the data received and in turn send an sms notification to the data subject.

The data processed is the following:

- Data Subjects residing in Malta who fill in and submit registration form provided:

Name, Surname, ID number, ID document number, date of birth, address, location, mobile number, preferred location and time for appointment.

-Cross-reference of personal data for data verification:

ID number, ID document number and date of birth are verified with Central Database (CdB) information to confirm that data pertains to ID card holder and to be able to populate required personal data.

-Verification of Mobile number:

On submission of mobile number information is shared with a third party sms notification provider in automated format. The sms provider sends a verification code to ensure two-factor authentication and ensure that the correct mobile number is inputted to receive an sms notification.

-Sharing of data with Vaccine Registration System to allocate appointments:

On submission of request, data will be shared in automated means to the VRS, which in turn will allocate an appointment as per availability and send sms notification with appointment detail to requestors.

## **5. Data Security**

To protect data against unauthorised access, loss, or misuse, the Data Controller, the Director General Healthcare Services, and the data processor, MITA, take appropriate security measures of a technical nature (e.g. logging, access controls and restrictions, data backup, IT and network security solutions) and organisational nature (e.g. staff directives, confidentiality agreements, inspections).

The same conditions will apply for the other data processors, namely VRS and sms notification suppliers.

## **6. Deletion of data**

All personal information will be retained for a maximum of 2 years after project is complete, after which it will be deleted. Data shared on VRS once an appointment is allocated and registered, this is retained up to 10 years after death of data subject. Mobile data shared with the sms notification system will be retained for up to twenty four hours after sms delivery.

Aggregated data will be retained for 10 years after which it will also be deleted.

## **7. Transferred of data**

The data generated in the form is hosted within the Microsoft Azure Cloud Amsterdam data centre located in the Netherlands, also referred to as the Azure West Europe Region. Azure Cloud services are used to host the COVID-19 Vaccination application including storing and processing of interest uploaded by the data subjects residing in Malta through the application.

All Azure services used by the solution have been configured to be confined to the West Europe (WE) region which means that processing and data, including back up, stored on the application will not be transferred out of the European Union.

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## **8. Your rights under data protection law**

The individual's rights pursuant to data protection laws are not restricted as far as the data subject's request does not limit the functions and powers of the Director General Healthcare Services to collect and process the data, which are based on a mandate assigned by, and in line with, the requirements laid by law.

The GDPR establishes a formal procedure for dealing with data subject access requests. All data subjects have the right to access any personal information kept about them on the COVID-19 Vaccine Registration Form. Requests for access to personal information by data subjects are to be made in writing to the Director General Healthcare Services. Your identification details such as ID number, name and surname and address have to be submitted with the request. In case we encounter identification difficulties, you may be required to present an identification document.

All data subjects have the right to request that their information is erased or not used in the event the data results to be incorrect. Once the form has been submitted, it is not possible to withdraw registration or to change contact details hence to amend submission you will need to request to cancel request and resubmit a new one.

Should you wish to exercise such rights contact Covid-19 vaccine support team on:

Contact number: 145

e-mail address: [covid-vaccine@gov.mt](mailto:covid-vaccine@gov.mt)

Your identification details such as ID number, name and surname and address have to be submitted with the request. In case we encounter identification difficulties, you may be required to present an identification document.

You also have the following data protection rights:

- the right to contact the data protection officer and raise your concerns (Article 38(4) of the GDPR); and

- the right to lodge a complaint with the Office of the Information and Data Protection Commissioner (IDPC) who can be contacted at:

Address: Level 2, Airways House,  
High Street,  
Sliema SLM 1549  
Telephone: 23287100  
Email: [idpc.info@gov.mt](mailto:idpc.info@gov.mt)

## **9. Amendments to this Privacy Policy**

The Director General Healthcare Services may amend this Privacy Policy at any time without prior notice.

Last amended: 6<sup>th</sup> April 2021