

**ANNEX 1 (SURVEY) TO THE PROCEDURE TO CONNECT AND DISCONNECT THE  
PARTICIPATING COUNTRIES FROM THE EFGS (EUROPEAN FEDERATION GATEWAY  
SERVICE)**

**1. Legal basis of this document**

This survey is submitted to the eHealth Network Secretariat pursuant to section 2.1 lit. d), b) of The Procedure to Connect and Disconnect the Participating Countries from the EFGS (European Federation Gateway Service).

**2. Survey**

**Question PUR-1**

Does the national contact tracing and warning mobile application pursue **the sole purpose of contact tracing** so that users potentially exposed to the SARS-Cov-2 virus can be alerted and supported while not being **used or usable for any further or different purpose?**

Please respond YES or NO; in case of the answer being NO, please explain the further purposes. If the data sent through EFGS is used for further purposes provide the reasons why they would be admissible for the joint controllers as a whole, and the safeguards applied to ensure appropriate protection of personal data for this processing.

Please activate "YES" to confirm or "NO" to negate:

YES

NO

In case of NO:


**Question PUR-2**

Do users that were reported as positive for a SARS-CoV-2 infection make a voluntary choice to upload their temporary exposure keys to the EFGS?

Please activate "YES" to confirm or "NO" to negate:

YES  NO

In case of NO, please explain:

  
  
  
  
  
  
  
  
  

**Question PUR-3**

Will personal data downloaded from the EFGS not be used to infer the **location and/or interactions** of any user of the national contact tracing and warning mobile application or of the data subjects sharing their ephemeral personal data by means of the EFGS?

Please respond YES or NO whether the assumption is correct in case of the national contact tracing and warning mobile application; in case of the answer being NO, please explain the data inferred and the grounds for the legitimacy of the inference.

Please activate "YES" to confirm or "NO" to negate:

YES  NO

In case of NO:


**Question PUR-4**

Will the personal data downloaded from the EFGS not be used to infer the **identity** of any user of the national contact tracing and warning mobile application or of the data subjects sharing their ephemeral personal data by means of the EFGS?

Please respond YES or NO whether the assumption is correct in case of the national contact tracing and warning mobile application; in case of the answer being NO, please explain the data inferred and the grounds for the legitimacy of the inference.

Please activate "YES" to confirm or "NO" to negate:

YES                       NO

In case of NO:



**Question PUR-5**

Are the functions to perform contact tracing and warning going to be implemented and in operation at the time of connection of the national contact tracing and warning system to the EFGS, i.e. is the personal data downloaded going to be used in operational use at the time of connection to the EFGS?

Please respond YES if the data is used operationally or NO if the data is used otherwise; in case of the answer being NO, please explain what is the intended timeline for the functions to go into operation.

Please activate "YES" to confirm or "NO" to negate:

YES

NO

In case of NO:


**Question FUNC-1**

Is the back-end of the national contact tracing and warning mobile application implemented and configured to transmit to the EFGS only the personal data detailed in Art. 7a s. 3 of the Implementing Decision (EU) 2020/1023?

Please respond YES or NO; in case of the answer being NO, please explain the type of data being added and the grounds for the legitimacy of the addition.

Please activate "YES" to confirm or "NO" to negate:

YES

NO

In case of NO:


**Question FUNC-2**

Does your national back-end of the contact tracing and warning mobile application transmit data on the onset of symptoms of the user to the EFGS? If so, is this transmission of data on the onset of symptoms of the user optional for the user of the contact tracing and warning mobile application?

Please respond YES or NO; please explain, if not an optional specification.

Please activate "YES" to confirm or "NO" to negate:

YES

NO

In case of NO:


**Question FUNC-3**

Does the national contact tracing and warning mobile application identify a temporary exposure key that was matched as a contact of the user?

Please respond YES or NO; in case of the answer being YES, please explain the working of the function and the grounds for the legitimacy of the function.

Please activate "YES" to confirm or "NO" to negate:

YES                       NO

In case of YES:


**Question FUNC-4**

Does the national contact tracing and warning mobile application or the national contact tracing and warning mobile application's back-end store any personal data downloaded from the EFGS or derived from data downloaded from the EFGS for more than 14 days?

Please respond YES or NO; in case of the answer being YES, please explain the retention of data in the national contact tracing and warning mobile application or the respective back-end exceeding 14 days and the grounds for the legitimacy of the longer retention.

Please activate "YES" to confirm or "NO" to negate:

YES

NO

In case of YES:


**Question FUNC-5**

Is a procedure in place to erase any personal data downloaded from the EFGS from the back-end of the national contact tracing and warning mobile application completely and comprehensively in the event that any of the following events occur: (i) a "return to normal" is decided by the relevant competent public authorities (ii) the national contact tracing and warning mobile application is no longer operated by the relevant authority or (iii) the participation in the EFGS terminates?

Please respond YES or NO; in case of the answer being NO, please explain if and when such a procedure is going to be introduced.

Please activate "YES" to confirm or "NO" to negate:

YES  NO

In case of NO:


**Question FUNC-6**

Does the national contact tracing and warning mobile application remove all temporary exposure keys that were provided by the EFGS to the national contact

tracing and warning mobile application immediately after processing in the application from the device?

Please respond YES or NO; in case of the answer being NO, please explain which data remains stored and the storage period.

Please activate "YES" to confirm or "NO" to negate:

YES

NO

In case of NO:


**If answered NO to Question FUNC-6, please answer Question FUNC-7.**

**Question FUNC-7**

Is the national contact tracing and warning mobile application configured and implemented so that in case of removal of the application, temporary exposure keys provided by the EFGS do not remain in intelligible form on the device?

Please respond YES or NO; in case of the answer being NO, please explain which data remains stored and the storage period.

Please activate "YES" to confirm or "NO" to negate:

YES

NO

In case of NO:


**Question TRANS-1**

Have users been informed of the processing in the EFGS as required in Art. 13 of the GDPR?

Please respond YES or NO; in case of the answer being NO, please explain the information and transparency arrangements for informing about the processing in the EFGS.

Please activate "YES" to confirm or "NO" to negate:

YES

NO

In case of NO:


Can you provide a copy of the information or a corresponding publicly available link to the information?

Please respond YES or NO; in case of the answer being YES, please provide the link or a copy of the information in convenient form.

Please activate "YES" to confirm or "NO" to negate:

YES

NO

In case of YES, please provide the link below:


**Question TRANS-2**

Please indicate if reference was made to the Commission's website in order to fulfil requirements from TRANS-1. If reference was made, can you provide a copy of or a link to the document linking to the Commission's website?

Please respond YES or NO; in case of the answer being YES, please provide the link or a copy of the information in convenient form.

Please activate "YES" to confirm or "NO" to negate:

YES

NO

In case of YES, please provide the link below or a copy of the information in convenient form. Please indicate if the document is the same material as in TRANS-1:


**Question TRANS-3**

Please indicate if additional information material such as promotional material, marketing campaigns or general public information literature was provided to the users of the national contact tracing and warning mobile application. If such information was made available to the users, can you provide a copy of or link to this information, or some examples?

Please respond YES or NO; in case of the answer being YES, please provide the link or a copy of the information in convenient form.

Please activate "YES" to confirm or "NO" to negate:

YES

NO

In case of YES, please provide the link below or a copy of the information in convenient form:


**Question LEGAL-1**

Is consent used as a legal basis for collecting and transmitting personal data as well as the subsequent processing via the EFGS? Please respond YES or NO; in case of the answer being YES, please provide both a version of the template consent form in an official language of the member state as well as in English.

Please activate "YES" to confirm or "NO" to negate:

YES

NO

In case of YES, please provide the link below or a copy of the information in convenient form:


**Question LEGAL-2**

Has a parliamentary or secondary law been used as the legal basis for collecting and transmitting the personal data as well as the subsequent processing via the EFGS?

Please respond YES or NO; in case of the answer being YES, please provide the link or a copy of the information in convenient form. If an English language version of the law is available, please provide a reference to this version as well.

Please activate "YES" to confirm or "NO" to negate:

YES

NO

In case of YES, please provide the link below or a copy of the information in convenient form:


Is a reference to the law provided in the English language? Please respond YES or NO; in case of the answer being YES, please provide the link or a copy of the information in convenient form.

Please activate "YES" to confirm or "NO" to negate:

 YES NO

In case of YES, please provide the link below or a copy of the information in convenient form:
