

PASSENGER LOCATOR FORM. QUESTIONS FROM MS

- **Who will be the owner of the database in which the data are stored?**

Based on the system architecture, under an EU level umbrella there will be national databases where national data will be stored. Member States (MS) will be the owners of their national database.

Credential access will be required for each national database and MS will only have access to their own national data.

Each MS would assign a **national administrator** for their database. The national administrator would be responsible to assign a **regional administrator** (e.g. in countries with regional systems like Germany) and/or a **local administrator (at PoE level)**. National and regional/local administrators may have different access rights under the system, but these administrators will only have access to their own national data through their national database.

As an example of national data storage, if a passenger is travelling from Greece to Italy data will only be stored in the Italian national database and accessed only by the assigned Italian national/local administrators.

- **Who will be responsible for delivering and processing the data requested of passengers, and which parties may request these data and with which purpose?**

In the event that a passenger is identified with an infectious disease such as COVID-19 and contact tracing is required, including notifying other MS, exchange of data between MS will be feasible.

- **On which grounds may data be modified by auditors?**

Could you please explain further what is meant by this question, especially what is meant by auditors.

- **Can access to a MS be refused on the basis of an EU PLF? If so, on which grounds?**

No, access to a MS cannot be refused on the basis of an EU PLF, since MS will only have access to their own national data and data belong to those MS.

- **How will MS be informed on the progress made on the development of the EU PLF?**

Commission will regularly inform the members of the HSC and the joint action will inform the consortium countries.

- **How will MS experts be involved the development and use of the EU PLF?**

At the first stage of EU PLF development, an expert working group was established. Objectives of the working group are to gather information on the implementation of national dPLF systems, to support identification of the legal bases of processing personal data of passengers completing PLFs in a digital format, to finalize digital PLFs for each transport sector (aviation, cruise ships, ferries, ground) and to outline the technical specifications/format of the web-based forms.

This working group now consists of representatives from EASA, ECDC, ERA, EMSA and IATA. The working group is also comprised of experts from the competent authorities of countries participating in the joint action consortium including from Greece, Poland, Germany, Italy, Lithuania, Slovenia and The Netherlands. Furthermore, the transport industry such as Cruise Lines International Association Europe (CLIA Europe), Interferry and the International Union of Railways (UIC) have been informed about the EU PLF and will provide input.

MS will also be involved in the pilot-testing phase of the EU PLF, which is currently planned to take place in 2 EU MS. Additional MS can be involved in the pilot-phase if they wish.

If MS would like, they can also assign additional persons to participate in the working group.

- **How will the EU PLF relate to national systems?**

We are aware that several MS have developed or will develop national PLF systems, especially for the air sector. During the first stage it is intended that pre-existing systems will be linked with the EU PLF system and exchange of data between MS will be feasible.

At a second stage, the intention is to work with MS to support step-by-step integration of national systems into the EU PLF to promote harmonization of information collected through PLFs. Dialogue with MS could be used to discuss national pre-existing forms and explore if they could be modified to achieve standardization.

- **Will the PLF application be made interoperable with existing national applications which have a warning function for COVID-19?**

The system will support interoperability with other Information Systems via web services. The system will be adjusted so that it will be able either to receive or send data via secure channels and protocols.

- **Will it become mandatory for MS to use the EU PLF, or is this meant as a template for MS to be further developed at the national level**

To be decided.

- **Whereas we fully support the joint EU action in this regard and the need of EU wide approach regarding PLF forms we think involvement of MS in the process should be intensified, beyond involving national agencies, but also including IPCR, possibly COREPER level. Could the COM elaborate on the further steps?**

To be decided.

- **We would like to know more detailed information on data accessibility rights, ownership of data, storage of it, data security aspects, compatibility of the app with EU GDPR rules, involvement of national experts in development of the modalities of the form/app.**

The data will be stored on EU Cloud infrastructure and will be hosted in EU territory. The platform will be accessed via user authentication mechanisms over SSL/TLS protocols. Different user and system roles will be implemented (e.g. EU Administrator, National Administrator). Passenger registration and process. A QR code system will be used for data verification. GDPR compliance mechanisms will be used. The web interface will be user friendly making use of HTML5 and CSS3 technologies. Pilot testing in each phase of the project is included. Technical support will be provided. Interconnection with other existing Information Systems will be established.

- **To our view the EU PLF should contribute to the national PLF solutions we have developed during the last months. E.g. we use the PLF form also to overlook if the self-isolation rule is complied by person. Would EU PLF work only to contact-searching or expanding the scope is under consideration?**

Expanding the scope of the EU PLF is being considered, but this would be done at a future stage. In addition to the EU PLF facilitating contact tracing, a number of possibilities can be explored for linking the EU PLF system with other applications in the future. The EU PLF could be linked with risk assessments or testing protocols if testing is decided. For example, it could be explored to link the EU PLF with the application of the ECDC maps (requested in the Council Recommendation on a coordinated approach to the restriction of free movement in response to the COVID-19 pandemic in EU/EEA and the UK), in order to link with a testing protocol.

- **possible “harmonisation” of the Passenger Locator Forms, e.g. the scope of data to be gathered, level of flexibility or the form in which the common form would be adopted.**

A primary aim of the EU PLF is to achieve a certain harmonization/standardization of information collected in the PLF among MS. For this purpose, in the EU PLF mandatory minimum fields are being proposed for each type of digital PLF (cruise, ferry, aircraft, land). However, there is also the possibility of allowing some flexibility in the forms if MS would like to collect some additional information.