



# **“Community Health Workers (CHWs)” Privacy Statement**

## **I. Privacy statement**

The Community Health Workers Project (hereinafter “CHW”) aims to enhance vulnerable groups’ access to primary healthcare. Vulnerable groups are people who are in a socially vulnerable situation and find it difficult to access primary healthcare because of their socio-economic status.

The task of any CHW is to:

- enhance this target group’s access to primary healthcare, in particular during the COVID-19 crisis;
- encourage vulnerable groups to avail of primary healthcare so that they don’t fall through the cracks during this crisis;
- identify any inequality and structural accessibility issues within primary healthcare, with a special focus on the consequences of COVID;

The purpose of this Community Health Workers (CHWs) Privacy Statement is to explain how and why we process your data as required by Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016.

We want to explain to you:

- Why we collect your personal data in the context of the CHW Project;
- What we do with your personal data and how long we retain them for;
- Your rights relating to the processing performed.

### **1.1. Data controller**

ZPG Intermut with registered office at Tervurenlaan 188/A letter box 8, 1150 Sint-Pieters-Woluwe, company number 0695 810 791.

ZPG Intermut is composed of:

- Insurance Institution (hereinafter 'II') 100: 'Landsbond der Christelijke Mutualiteiten' with registered office at Haachtsesteenweg 579, 1030 Schaarbeek and company number 0411.702.543,
- II 200: 'Landsbond van de Neutrale Ziekenfondsen' with registered office at Charleroisesteeweg 145, B-1060 Brussels and company number 0411.709.768,
- II 300: 'Nationaal Verbond van Socialistische Mutualiteiten', with registered office at Sint-Jansstraat 32-38, 1000 Brussels and company number: 0411.724.220,
- II 400: 'Landsbond Liberale Mutualiteiten' with registered office at Livornostraat 25, 1050 Brussels and company number 0411.729.366,
- II 500: 'Landsbond van de Onafhankelijke Ziekenfondsen', with registered office at Lennikse baan 788 A, 1070 Brussels and company number 411.766.483.

## **1.2. What personal data do we process?**

To register the target group's personal data we use the mobile CHW app. Most data are obtained from you directly on the basis of questions a community health worker put to you. You are free to answer the questions or not.

### **A) In general**

- Contact details (first name, surname, nickname, e-mail address, telephone number, address);
- Personal characteristics (gender, date of birth, nationality, language, mother tongue);
- Any other personal data you disclose voluntarily;

### **B) We may also process the following personal data relating to the Community Health Workers' target group:**

- Neighbourhood;
- Indirect health data (e.g.: Do you have a GP? Do you have a centralised medical record? Health insurance fund? Insurance?);
- Income (permanent job, temporary job, allowance ...);
- Legal status (Belgian nationality, asylum seeker, refugee, ...
- Living situation (permanent residence or not) assessment of this situation;

- Assessments;
- Location (team-related): food bank, street/square, called into a health centre, called into a local non-profit association, private dwelling;
- Subject of intervention (care, covid or other e.g. VDAB-le Forem, OCMW-CPAS, social housing, ...);
- Experienced barriers (such as lack of trust, language, administration, accessibility, ...);
- The role of CHW to which the action is linked;
- Notes (including details, address, date, subject, life event and visibility).

C) Specific to CHWs: job description;

D) We may also process the professional contact details (surname, first name, address, e-mail address, telephone number) of a care provider, carer, GP, social worker. Details such as these are not obtained from the care provider, carer, GP or social worker but from the data subject who forms part of the target group and only to make contact with the care provider, carer, GP or social worker if the need arises and in consultation with the data subject.

E) When completing the contact form on the CHW website, the following personal data are processed: surname, first name, company, role, e-mail address, telephone number.

### **1.3. On what legal basis do we process your data?**

We process your personal data on the following legal bases:

- In virtue of the law (see 1.3.1) implementing the agreement with the National Institute for Health and Disability Insurance (NIHDI) dd. 26 January 2021 and the addendum to the agreement of January 27, 2022
- The processing of certain categories of personal data is necessary to administer the health care systems and services or social systems and services under Belgian law;
- Scientific research, approved by the "Ethics Committee for the Social Sciences and Humanities":
  - You may also be asked for your consent for qualitative research purposes (via a survey or an interview conducted among participants or via a workshop.)
  - For quantitative research we use the data recorded in the CHW app, this for scientific research purposes.

- We will also seek your verbal consent before we process any photographs (for the controller's internal use).

Any data we obtain via the contact form on the CHW website are processed on the basis of your consent.

### **1.3.1 Legal references**

The Act on mandatory insurance for medical care and sickness insurance benefit, coordinated on 14 July 1994, more specifically article 56, §1 facilitating reimbursement for experimental models of prescription, provision of or the payment for medical care.

### **1.4. Purposes of the processing**

ZPG Intermut processes these data in the context of the performance of the CHW Project in implementation of the cooperation agreement with the NIHDI and this for the purpose of:

- Eliminating the barriers hampering access to primary healthcare for data subjects;
- Directing data subjects towards the appropriate care;
- Improving health literacy and facilitating the follow-up of any interventions performed;
- Evaluating the present project and producing a research report;
- Dealing with your request for information when you have filled in the contact form on the CHW website.

### **1.5. How long do we retain your data in the context of the CHW Project for?**

We store and use your personal data insofar as necessary to comply with our legal obligations. If the law or regulations do not specify a specific time limit, the data are retained for the time needed to allow us to meet our contractual obligations and in any case for the duration of the project (i.e. to the end of December 2022). The project may be extended. If this is the case, this privacy statement will be updated with the new duration.

### **1.6. Who are the recipients of your data?**

- Your data may be processed by members of staff involved in the project in a professional capacity, i.e. the CHWs (employed by I.M. VZW), including the members of staff of ZPG Intermut and the insurance institutions concerned.
- The CHW application uses Amazon Web Services EMEA (SARL) for Cloud Hosting; your personal data are processed in Germany. An

agreement has been concluded with Amazon Web Services EMEA (SARL) to guarantee data confidentiality.

- The University of Antwerp, in the context of the research, is also bound by a processing agreement.

## **1.7 What are your rights with regard to the personal data we process?**

You are free to exercise the rights set out below, provided they do not conflict with the legal obligations the controller is subject to or with the statutory mandate it was entrusted with.

### **Right to withdraw your consent**

If the legitimacy of the processing is based on your express consent you are free to withdraw that consent at any time. Any processing operations performed prior to the withdrawal of your consent remain legitimate.

### **Right of access**

As data subject you are entitled to find out whether or not the controller processes your personal data and, if so, to gain access to your data. You can request a copy of your personal data provided your request does not infringe the rights and freedoms of third parties.

### **Right to rectification or modification**

You are entitled to request that any incorrect and/or incomplete data are rectified and/or completed.

### **Right to erasure**

You are entitled to request that your personal data are deleted if the controller processed them unlawfully, provided you do so for justifiable reasons, i.e.:

- If your data are no longer necessary for the purposes of the processing;
- If you have withdrawn your consent and there is no other legal ground for the processing;
- If your objection to the processing is founded;
- If the processing is unlawful;
- If your data must be erased by law.

### **Right to restriction of processing**

You can ask to limit the use of your data:

- For the time needed to verify the accuracy of the data you are disputing;

- If you object to any data the controller processed unlawfully being erased;
- If you object to any data the controller no longer needs being erased because you need them to bring, exercise or defend a legal claim;
- For the time needed to establish whether the controller's legal grounds take precedence over yours in cases where you object to your data being processed by reason of your specific situation.

In that case, the controller is obliged to limit the processing of your data to their retention only. Any other processing operations will always require your consent unless they are needed for the purpose of bringing, exercising or underpinning a legal claim, to protect a third party or for important public interest reasons. Where appropriate, the controller will inform you before this restriction of processing is lifted.

### **Data portability**

You are entitled to receive the personal data relating to you in a structured, commonly used and machine-readable format and to transfer these data to another data controller.

You are free to ask the controller to transmit your data to another data controller, provided it has the technical means to do so.

### **Right to object**

If you disagree with us processing certain data you can object to their processing at any time.

If your data are processed for scientific, historical or statistical research purposes you can object to their processing for reasons specific to your situation, except in cases where the processing is necessary for the performance of a task carried out in the public interest.

## **1.8. Exercising your rights**

The rights set out sub 1.7 can be exercised in accordance with the provisions and restrictions laid down by law. The text of the General Data Protection Regulation supersedes what has been set out sub 1.7.

If you wish to exercise any of the aforesaid rights, please do not hesitate to contact us. You can exercise these rights vis-à-vis the controller listed in article 1.1 above.

Make sure to be as specific as possible if you do decide to exercise your rights as this is the only way we will be able to process your request concretely and correctly. To allow us to identify you, we may ask you for a copy of an identification document.

## **Privacy point of contact**

E-mail address [privacy@chw-intermut.be](mailto:privacy@chw-intermut.be)

Address: Landsbond der Christelijke Mutualiteiten – CHW Project,  
Haachtsesteenweg 579, 1030 Schaarbeek.

Aside from the option to contact us directly if you have any questions or wish to exercise your rights, you can also contact the Belgian Data Protection Authority (formerly the Privacy Commission) and lodge a complaint if need be: Data Protection Authority, Drukpersstraat 35, 1000 Brussels - [www.dataprotectionauthority.be/contact](http://www.dataprotectionauthority.be/contact).

## **1.9. Further information?**

The information on this page relates to the CHW Project. For more general information about the processing of your data, please refer to the privacy statement of the insurance institution you are affiliated to which you will find on their website.