

The Declaration on the interoperability of location applications in the context of the Covid 19 pandemic, which is based on Guide no. 4/2020 on the use of location data and detection tools in the context of the Covid-19 pandemic.

The Declaration emphasizes the need to respect the transparency and legality of the processing involved, the rights of users, the principle of minimizing data and ensuring their confidentiality. Also, interoperability should not be used as a reason to extend collection beyond what is necessary.

In this context, we reiterate that, on 21 April 2020, the European Data Protection Board adopted Guideline no. 4/2020 on the use of location data and detection tools in the context of the Covid-19 pandemic.

This Guide was brought to the attention of the general public through the ANSPDCP press release of April 24, 2020, stating that it highlights the conditions and principles of proportional use of location data in order to monitor the spread of the virus, respectively the detection tools. to notify people close to other people found to be infected. On this occasion, the Committee emphasized that the use of this data should be done voluntarily by each person and that the person's movements should not be monitored, and that the principles of necessity and proportionality should be respected in establishing measures during this period.

As such, we draw the attention of operators / persons authorized by the operator who intend to develop / implement location and detection applications in the context of the Covid 19 pandemic on the need to comply with personal data protection rules, general principles of processing, especially the principle of privacy by design and by default, the principle of ensuring security and confidentiality and the principle of responsibility, respectively on the need to comply with Guide no. 4/2020 on the use of location data and detection tools in the context of the Covid-19 pandemic.

Thus, we emphasize that, in this Guide, it has been established that the detection applications do not involve the use of location data, but only proximity data, as well as the fact that it is necessary to perform an impact assessment (DPIA) in accordance with art. 35 of the GDPR, by the operator prior to the implementation of this type of application, taking into account the sensitive nature of personal data processed on a large scale.

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