

Coöperatie Menzis U.A.

Chairman of the Board of Directors

Mr R. Wenselaar

PO Box 75000

7500 CC Enschede

Date

January 9, 2019

Our reference

[CONFIDENTIAL]

Contact

[CONFIDENTIAL]

070 8888 500

Subject

Decision to collect penalty

Authority for Personal Data

PO Box 93374, 2509 AJ The Hague

Bezuidenhoutseweg 30, 2594 AV The Hague

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authoritypersonal data.nl

Dear Mr Wenselaar,

By decision of 15 February 2018 with reference z2016-12335, the Dutch Data Protection Authority (AP) has pursuant to Section 65 of the Personal Data Protection Act (Wbp) and viewed in conjunction with Section 5:32, first paragraph, of the General Administrative Law Act (Awb), an order subject to periodic penalty payments has been imposed on the Coöperatie Menzis U.A. (Menzis) for violation of article 13 of the Wbp, now article 32 of the General data protection regulation (GDPR).

In a letter dated 12 November 2018, the AP informed Menzis of its intention to collect the amounts paid by Menzis  
forfeit penalty sent. In this intention, the AP has committed a violation of burden part 1 of the  
imposed under penalty. Menzis gave its opinion on this intention on 6 December 2018  
datum.

In this decision, the AP notes that Menzis has not fully complied with part 1 of the out of 15  
order subject to periodic penalty payments imposed in February 2018 and therefore a penalty of €50.000,00 by operation of  
law  
has forfeited. Menzis will therefore receive after sending this collection order and after  
court decision in the case z2016-12335 of the CJIB – on behalf of the AP – an exhortation to  
two weeks to pay.

1

Our reference

[CONFIDENTIAL]

Date

January 9, 2019

#### 1. Procedure

On February 15, 2018, the AP imposed an order subject to periodic penalty payments on Menzis in connection with. a violation  
of

Article 13 of the Wbp.

In a letter dated 17 April 2018, Menzis informed the AP about the progress of the implementation of  
the various remedial measures to comply with the order subject to periodic penalty payments.

On April 24, 2018, the AP confirmed receipt of the progress report by letter.

In a letter dated 3 May 2018, Menzis sent documents to the AP in order to demonstrate that Menzis  
complies with part 1 of the order subject to periodic penalty payments.

On May 25, 2018, the AP announced by letter that an on-site investigation (OTP) is necessary  
for checking part 1 of the order subject to periodic penalty payments.

In a letter dated 29 May 2018, Menzis sent documents to the AP to demonstrate that

Menzis complies with part 1 of the order subject to periodic penalty payments.

On June 12, 2018, the AP confirmed by letter that the OTP will take place on June 18, 2018 at the office from Menzis in Wageningen.

On 18 June 2018, the OTP took place at the Menzis office in Wageningen. The AP has requested Menzis during this on-site investigation to send information to the AP. The final report of this on-site investigation was sent to Menzis by letter dated 31 July 2018.

Menzis responded to the AP's request in an email dated 18 June 2018.

On June 26, 2018, the AP sent a further request for information by letter and e-mail.

Menzis responded to the AP's request in an email dated 27 June 2018.

On 28 June 2018, Menzis answered questions from the AP by telephone. The AP and Menzis have during agreed during this telephone conversation that Menzis would look into one question and answer it later. It

The final report of this meeting was sent to Menzis by letter dated 31 July 2018.

In an email dated 3 July 2018, Menzis answered the outstanding question dated 28 June 2018.

On July 5, 2018, the AP requested a further request for information by e-mail.

Menzis responded to the AP's request in an email dated 10 July 2018.

2/14

Date

January 9, 2019

Our reference

[CONFIDENTIAL]

On 6 August 2018, Menzis answered questions from the AP by telephone.

On 7 August 2018, the AP informed Menzis by telephone that the AP had reached its conclusion

It has come to the conclusion that Menzis does not comply with part 1 of the order subject to periodic penalty payments because employees of the

Marketing and Sales department still have unauthorized access to health data.

On August 8, 2018, the AP sent a letter requesting further information.

Menzis responded to the AP's request in an email dated 20 August 2018.

On 10 September 2018, the AP sent Menzis the report with findings about the follow-up check.

In a letter dated 24 September 2018, Menzis expressed its view on the report containing findings the follow-up.

On October 5, 2018, the AP sent a further request for information by letter.

Menzis responded to the AP's request in a letter dated 22 October 2018.

On November 12, 2019, the AP informed by letter an intention to collect the forfeited by Menzis periodic penalty payment to Menzis and to Vrijbit as an interested party.

In a letter dated 16 November 2018, Vrijbit gave its written opinion on the intention to collection of the penalty forfeited by Menzis. The AP has Vrijbit's view on 21 forwarded to Menzis by e-mail in November 2018.

In a letter dated 6 December 2018, Menzis gave its written opinion on the intention to collection of the penalty forfeited by Menzis.

## 2. Text of the violation and load part 1

### 2.1 Text of the Violation

The established violation in the order subject to periodic penalty payments as stated by the AP by decision of 15 February 2018 has been imposed on Menzis reads as follows:

In the findings, the AP comes to the conclusion that Menzis violates Article 13 of the Wbp. The AP has it in that context observed the following:

1. Menzis has organized its corporate culture in such a way that only employees may have access to personal data concerning health insofar as this is necessary for the purpose for which the employees process the personal data. For example, Menzis has laid down that marketing employees may not process personal data relating to health.

January 9, 2019

Our reference

[CONFIDENTIAL]

2. However, the AP's investigation shows that marketing employees of Menzis do in fact have access to personal data concerning health. Being able to consult personal data is, pursuant to Article 1, preamble and under b of the Wbp to be regarded as the processing of personal data.

3. Menzis therefore does not have sufficient technical resources to ensure that employees do not have access to personal data that are not necessary for the purpose for which they are processed. In that context, the AP points out that Menzis, for example, does not keep any log files about access to personal data, including special personal data.

4. The foregoing leads to the conclusion that Menzis does not have suitable technological measures as referred to in Article 13 of the Wbp. The AP has underlying documents that show how a marketing campaign is involved. Menzis does not find any indications for the conclusion that marketing employees actually process personal data concerning health for a marketing campaign. However, it does not detract from the conclusion that article 13 of the Wbp has been violated, because the technological measures that Menzis affected are not appropriate.

## 2.2 Text of load part 1

The authorization matrix and associated documents in which it defines the logical access security of its van Part 1 of the order subject to periodic penalty payments as imposed by the AP in a decision of 15 February 2018 to Menzis reads as follows:

The AP orders Menzis to set up its system in such a way that unauthorized access to personal data is prevented is prevented.

To this end, it must in any case:

1.  
systems, must be adjusted. These documents should be amended or

redrafted so that it clearly shows which access rights employees have. The authorization matrix serves a provide a clear overview of the authorizations and view roles associated with a function or role by means of below more uniform use of terminology. Menzis must record for which function or role the processing is performed of personal data concerning health is necessary and for what purpose and this document if necessary adjust revised business insights. Furthermore, the authorizations of Menzis employees will continue to serve as a result factually aligned.

(...)

grace period and amount of penalty with regard to parts 1 and 3a

With regard to part 1. of this burden, the AP is of the opinion that less effort is involved in its implementation are. The AP therefore attaches a grace period to parts 1 and 3a of the order that ends on May 26 2018.

If Menzis does not meet the obligation before the end of the beneficiary period stated under 0, it will forfeit a penalty. The AP sets the amount of this penalty at an amount of € 50,000.00 for each (entire) week, after 4/14

Date

January 9, 2019

Our reference

[CONFIDENTIAL]

expiry of the last day of the set term, on which Menzis fails to comply with part 1 and part 3a of the order. to a maximum of € 250,000.00.

Considering the fact that the penalty should be an incentive to comply with the order, the amount of Menzis' turnover, the large number of insured persons and the seriousness of the violation, the AP deems the amount of this penalty appropriate.

### 3. Findings

#### 3.1 Findings prior to the 18 June 2018 on-site investigation

Menzis sent documents to the AP on 3 and 29 May 2018 in order to demonstrate that Menzis complies with part 1 of the order subject to periodic penalty payments. This documentation on the authorization policy of

Menzis is not just about the Marketing and Sales department, but about all Menzis employees.

Four documents are central to the documentation on the authorization policy:

- Overview of FAM authorizations for all employees with functional units<sup>1</sup>: an Excel file containing all users with associated IT roles and the indication whether there is access to personal data and personal data with regard to health.<sup>2</sup> The AP first viewed this document as a final situation. However, it later turned out that this document did not concern the final situation after 26 May 2018, but rather an inventory that was used to arrive at a desired situation.

Job Authorization Matrix (FAM)<sup>3</sup>: An overview of the business role name/authorization profile as can be assigned to an employee with the required roles (that an employee with this company role name), allowed roles (that an employee with this company role name can and is allocated by means of a separate procedure) and associated allocation rule. This document provides an overview of which company roles have been issued after the ones performed by Menzis adjustments.

Data Authorization Matrix (DAM)<sup>4</sup>: An overview of company role name/authorization profile with accompanying indicates whether this profile has access to, among other things, the Data Ware House, personal data and health data (care & claims and diagnoses/fraud).

Purpose limitation framework<sup>5</sup>: An overview of the business functions per cluster, whether access is required personal data and health data (care & declarations and diagnoses / fraud), where the data come from, for what purposes they were collected and what the basis is. By business function the roles and authorization profiles are indicated.

The AP first analyzed the documentation supplied by Menzis. From this, the AP concluded that the Excel document '20180425\_Overview FAM authorizations all employees with

<sup>1</sup> Official document name: 20180425\_Overview FAM authorizations all employees with functional units (003).

<sup>2</sup> This document pertains to the IST situation (actual situation, as configured in the Menzis systems) of 25 April 2018.

An IST situation should be seen in combination with a SOLL situation (a desired situation that is being worked towards).

<sup>3</sup> Official document name: FAM overview report 2018-05-30.

4 Official document name: 20180525\_Data\_Authorisation\_Matrix.

5 Official document name: 20180522\_Purpose Limitation Framework (005).

5/14

Date

January 9, 2019

Our reference

[CONFIDENTIAL]

functional units(003)' gave a recent overview of the authorizations of all employees. This is based on the following information:

- a. The naming of the Excel document containing the date.
- b. The columns mentioned, including: personnel number, sector, department, job title, authorization profile, access to personal data and access to health data.
- c. The large number of rows indicates that it does indeed concern all employees.

However, based on the accompanying documentation, it was not clear to the AP in advance that this was a document predates the changes in the FAM and DAM. During the on-site investigation Menzis only became aware that this document concerned an unrecent situation.

The AP subsequently decided to once again focus on the Marketing department in the follow-up inspection and Sales, because the previous investigation showed that the employees of the Marketing and Sales had unauthorized access to health-related personal data. On the basis of the Excel document '20180425\_Overview FAM authorizations all employees with functional units(003)', the AP has made a selection of employees of the Marketing and Sales department for the random check during the on-site investigation at Menzis in order to be able to obtain some authorisations check.

### 3.2 Findings during the on-site investigation of 18 June 2018

On 18 June 2018, the AP carried out an on-site investigation at Menzis to determine whether Menzis load part 1 correctly. During this investigation, the AP asked questions about the



documentation provided and a sample performed.

Menzis stated during the on-site investigation that the document '20180425\_Overzicht FAM authorizations all employees with functional units (003)' a non-current manually compiled list which has served as input for the re-establishment of the FAM and DAM. Following this finding, the AP reviewed the authorizations of the previously selected employees with the recent version of the FAM, the DAM and the purpose limitation framework.

Menzis has further stated that access to (special) personal data per position is laid down in the dam.

Menzis subsequently stated that, apart from the [CONFIDENTIAL] employee, no other employees within the Marketing and Sales department may have access to health data.

The AP has determined that the employee [CONFIDENTIAL] of the Marketing and Sales department has access to the SAS6 environment. This gives the [CONFIDENTIAL] access to a large number tables used for analysis. The AP has determined that this employee has access to the "idacom.DMT\_Salesforce\_Case" table. This table contains information about cases/complaints from individuals, including a column of information reported by the customer.

6 Statistical Analysis System is a collection of software used for analysis, business intelligence and, among other things data management.

6/14

Date

January 9, 2019

Our reference

[CONFIDENTIAL]

The AP has further established that the table contains columns that include the sender of the complaint (names of persons are visible on some lines in this column) and the content of the complaint (column name: "Description\_Problem") in which some lines contain health data are listed.

Menzis has stated the following about this:

“The Marketing and Sales department is involved in product development, and in view of this, the employees of this department have insight into the individual feedback on Menzis products.

Product development is a task that can be assigned to [CONFIDENTIAL] as an employee of this department assigned. It is therefore necessary for the fulfillment of his position that a marketing employee can see about which Menzis receives complaints. Menzis products are health insurance policies, which is why complaints and complaints can be made customer feedback contain medical information. Menzis's instructions on this apply to these employees handling personal data. Customer feedback is not classified as under the purpose limitation framework health data.”

In the context of this sample, apart from the table 'idacom.DMT\_Salesforce\_Case', the AP has no other sources of health data.

### 3.3 Findings after the on-site investigation of 18 June 2018

The AP has reviewed authorizations of seven previously selected employees in the context of the current situation with the following documents:

- 20180522\_Purpose Limitation Framework (005)
- 20180525\_Data\_Authorization\_Matrix
- FAM overview report 2018-05-30

The AP has determined in this sample that the access rights to personal data concerning the health are described in a consistent manner in the documentation mentioned above.

#### 3.3.1 Findings on the 'idacom.DMT\_Salesforce\_Case' table

On 27 June 2018, Menzis provided the AP with an overview of the last 100 entries from the table 'idacom.DMT\_Salesforce\_Case', including the column names, provided.

The AP has once again established that the table 'idacom.DMT\_Salesforce\_Case' contains personal data concerning health that are accessible to the [CONFIDENTIAL]. This means that employees, who, like the [CONFIDENTIAL], have been assigned the permitted role in the FAM

who gives access to this table, also in practice (may) have access to this data. These are for example, employees of the Marketing and Sales department with the authorization profile [CONFIDENTIAL], [CONFIDENTIAL] and [CONFIDENTIAL].

7/14

Date

January 9, 2019

Our reference

[CONFIDENTIAL]

The AP has also determined from the purpose limitation framework, the DAM and the FAM that an employee with the company role name/authorization profile [CONFIDENTIAL] (which is assigned to the [CONFIDENTIAL]) may have access to personal data but may not have access to health data. See see figures 3 and 4 for this. The same also applies, for example, to other employees of the department Marketing and Sales with the authorization profile [CONFIDENTIAL], [CONFIDENTIAL] and [CONFIDENTIAL].

[CONFIDENTIAL]

Figure 3. Row 20, columns A, C, D, E, F and G of document 20180525\_Data\_Authorization\_Matrix.

The absence of a cross in a column means no access to the data from that column.

[CONFIDENTIAL]

Figure 4. Row 6, column A, B, C, D, E, F, G, I and J in the second tab of the document 20180522\_Purpose Limitation Framework

(005). Under the heading 'Access to personal data' it only says 'Personal data'. Under the heading 'Features linked to the business processes' is the function [CONFIDENTIAL]. And under the heading 'Authorization profiles linked to the business processes' is the profile [CONFIDENTIAL].

Examples of personal data related to health in the table

'idacom.DMT\_Salesforce\_Case' are the following:

[CONFIDENTIAL]

Figure 5. Row 39, column A and AJ from part of the table 'idacom.DMT\_Salesforce\_Case', as provided by Menzis to the AP on June 27, 2018.

[CONFIDENTIAL]

Figure 6. Row 42, column A and AJ from part of the table 'idacom.DMT\_Salesforce\_Case', as provided by Menzis to the AP on June 27, 2018.

8/14

Date

January 9, 2019

Our reference

[CONFIDENTIAL]

[CONFIDENTIAL]

Figure 7. Row 81, column A and AJ from part of the table 'idacom.DMT\_Salesforce\_Case', as provided by Menzis to the AP on June 27, 2018.

On September 10, 2018, the AP published its findings about the follow-up, including the conclusion that Menzis therefore violated load part 1, determined and sent to Menzis. Menzis has in its view this report stated that Menzis classified the data from the table

'idacom.DMT\_Salesforce\_Case' has changed to health data.

Menzis submitted evidence on 22 October 2018 showing that on 20 September 2018 Menzis had has ensured that the employees of the Marketing and Sales department set the table Can no longer view 'idacom.DMT\_Salesforce\_Case'.

### 3.3.2 Findings on Applications Outside the Data Warehouse

Menzis stated on August 6 that authorizations for applications that do not use the Data War House, but provide access to health data, can be found in the following Menzis documentation:

-

In the current FAM overview (FAM overview report 2018-05-30) per

authorization profile display the 'Required Roles' and 'Allowed Roles'. The Required Roles has every employee with that assigned authorization profile. The Allowed roles can per employee differ depending on their specific task within the role.

- To determine which applications an employee has access to and whether this application access to health data should be looked into the document

'20180425\_Overview FAM authorizations all employees with functional units(003)'

(the deprecated IST situation/FAM) in the fourth tab 'IST – Users & IT Roles'.

Together with Menzis, the AP has these authorizations for applications that do not use the Data Ware House randomly checked among two employees. The AP also has one of its own additional check performed. In this sample, the AP has determined that these access rights to are described in a consistent manner in the documentation supplied by Menzis.

#### 4. Assessment

The Menzis authorization model shows that employees of the Marketing and Sales department (with the exception of one employee) should not have access to health data. Menzis has

9/14

Date

January 9, 2019

Our reference

[CONFIDENTIAL]

also stated during the on-site investigation that, apart from one employee, there were no other employees within the Marketing and Sales department may have access to health data.

However, as already stated in sections 3.2 and 3.3.1, the AP has established that employees of the Marketing and Sales department have access to the table containing 'idacom.DMT\_Salesforce\_Case' health data. Menzis has stated that for the employees of the the Marketing and Sales department is necessary to view this data and on the basis of it purpose limitation framework does not classify this data as health data.

The AP classifies some data from the idacam.DMT\_Salesforce\_Case table as personal data concerning health and concludes that employees of the Marketing and Sales department (met exception of one employee) have unauthorized access to health data.

For the concept of 'personal data' it is relevant whether the data contains information about a person.

The identifiability of the person is the second element that determines the answer to the question whether personal data is involved. The starting point is that a person is identifiable if he is identity can be reasonably established without disproportionate effort. Two factors are at play a role here: the nature of the data and the possibilities of the person responsible for identification to bring about. A person is identifiable if there is data that is alone or in combination with other data, are so characteristic of a specific person that they are based on it of which can be identified.

The concept of personal data concerning someone's health is understood broadly; it does not only include the data provided in the context of a medical examination or medical treatment by a doctor are processed, but all data affecting the mental or physical health of a person concern. In addition, the mere fact that someone is ill is also a fact about health, although that fact in itself says nothing about the nature of the disorder.

Data can be seen in Figures 5, 6 and 7 such as a chronic back condition, pregnancy and a fractured only are clear data concerning the physical health of a person. These data are by the insurance number and sometimes the name in the description for Menzis as controller and the employees of the marketing and sales department can also be traced to a natural person. Employees of the Marketing and Sales department thus have access to personal data concerning health.

Now it appears from the documents supplied by Menzis that employees of the Marketing and Sales department should not have access to health data, but the on-site investigation showed just that for these employees there is in practice access to personal data concerning health there is unauthorized access to personal data. Menzis has therefore not completed its system

arranged in such a way that unauthorized access to personal data is prevented.

10/14

Date

January 9, 2019

Our reference

[CONFIDENTIAL]

The AP is then faced with the question of whether Menzis has complied with part 1 of the imposed burden under duress. The AP takes into account the evidence provided by Menzis on 22 October 2018 that according to her, the violation has ended.

The AP has established that from 20 September 2018 Menzis will still comply with part 1 of the imposed order under penalty has been paid, because written documents and video material are sufficiently plausible created that the table "idacom.DMT\_Salesforce\_Case" with health personal data is no longer accessible to the employees of the Marketing and Sales department.

View of Menzis on report with findings and AP response

In its view on the report with findings, Menzis acknowledged that the personal data in the the aforementioned table should have been classified as health data. Menzies has further stated that the finding established by the DPA does not mean that it does not have the burden correctly complied. Menzis is of the opinion that this finding is not included in the authorization matrix, the corresponding documents or the actual authorizations based on them and therefore falls outside the burden. Menzies has that is not further substantiated or substantiated. The AP saw no response to this statement leads to deviate from her earlier findings.

View of Menzis on the intention to collect a penalty

Menzis takes the view that it has complied with part 1 of the order on time and in full penalty. Menzis puts forward three arguments for this.

Firstly, Menzis argues that there was no unauthorized access to personal data because the relevant employees were (at that time) authorized to have access to

the relevant table. The fact that Menzis does not treat the personal data in the table as personal data concerning health, does not mean that there was unauthorized access. In addition, the AP has only established that access was theoretically possible.

Secondly, Menzis concludes that the AP is of the opinion that the order subject to periodic penalty payments has been violated because

Article 32 GDPR has been violated. The conclusion from the AP report of September 10, 2018 seems to be in line with Menzis also points to such a vision. Menzis opposes this vision because the burden does not pertain to everyone violation of article 32 AVG and because there is no question of a violation of this article of law.

Thirdly, Menzis takes the position that there is a special circumstance that makes that collection should be waived. Menzis has only one of the three parts of the burden partially not implemented. Given the large number of employees and the large amount of files, incorrectly qualifying one table is a shortcoming that can be regarded as marginal. Moreover Part 1 of the burden has now been fully complied with.

Reply AP

The AP does not follow Menzis in its position that there is no question of unauthorized access to personal data. The AP has not tested whether the employees of the Marketing and Sales department had authorized access to the 'idacom.DMT\_Salesforce\_Case' table, but whether these employees were authorized to access personal health data. As before

11/14

Date

January 9, 2019

Our reference

[CONFIDENTIAL]

is described in the Menzis authorization model that employees of the Marketing and Sales should not have access to health data. The AP has determined that employees of the Marketing and Sales department nevertheless had access to health data in the table



"idacom.DMT\_Salesforce\_Case". In view of this, Menzis did not have its system in such a way designed to prevent unauthorized access to personal data about health. That Menzis acknowledged that it had not qualified the personal data in the table as health data does not change this conclusion. In addition, the AP has access to the systems during its visit to Menzis be able to determine that employees of the Marketing and Sales department actually work in practice, and not only in theory, had access to health data for product development.

The AP also does not follow Menzis in its view on article 32 GDPR. An imposed penalty is imposed forfeited by operation of law, as soon as it appears that the imposed burden has not been complied with. The follow-up by the AP

contrary to what Menzis believes, only sees the determination of whether the content of the imposed burden, as it was imposed at the time, and thus whether the imposed burden has been complied with.

Finally, the AP does not follow Menzis in the position that there is a special circumstance that means that collection must be completely waived. Partially, but not fully, comply

an order subject to periodic penalty payments is not a circumstance that has to lead to an administrative authority waiving of collection. Complying with a load component afterwards is also, in principle, no reason to deny

to waive recovery. In addition, the AP must pay part 2, which has a different grace period and

penalty, yet to assess. The AP further notes that the AP committed the violation on September 10

2018 and did not qualify as a continuing violation. If in this case the

AP had established the violation as a continuous violation, Menzis would have had to pay a penalty of €250,000.00 forfeited.

Vrijbit's view on the intention to collect a penalty and AP's response

Vrijbit states that Menzis processes medical personal data without a legal basis

before, with evasion of the then required by the Data Protection Board

to approve Code of Conduct. For Vrijbit it is important that the DPA pays the imposed penalty per progresses immediately.

The AP has taken note of Vrijbit's view. The statement that Menzis medical

processes personal data without a legal basis for doing so, with evasion of the

Code of Conduct, which was required to be approved by the Dutch Data Protection Authority at the time, plays into this decision making is irrelevant. With this decision, the AP will proceed to collect the penalty.

## 5. Conclusion

The authorization model and accompanying documents supplied by Menzis show that employees of the Marketing and Sales department should not have access to health data. The AP has during however, the follow-up inspection established that these employees did have access to in practice health data. Menzis had not set up its system in such a way that unauthorized access to personal health data is prevented.

12/14

Date

January 9, 2019

Our reference

[CONFIDENTIAL]

In view of this, the AP has established that Menzis has not fully complied with the first sentence of the order under periodic penalty payment in combination with burden part 1 from the decision of 15 February 2018.

On September 10, 2018, the AP published its findings about the follow-up, including the conclusion that Menzis therefore violated load part 1, determined and sent to Menzis.

With the evidence provided afterwards on 22 October 2018, Menzis has made it plausible that Menzis has from September 20, 2018 to the first sentence of the order subject to periodic penalty payments in combination with load part 1 has been fulfilled.

In view of the foregoing, Menzis has legally forfeited a penalty for the period of 10

September 2018 to September 20, 2018. This means that one full week has passed before the imposed load has been paid. The amount of the penalty forfeited is one time € 50,000.00  
€50,000.00.

Pursuant to Article 5:33 of the Awb, a forfeited penalty is paid within six weeks after it has been declared

legally forfeited. On the date of this decision, the AP has not yet received any payment.

## 6. Decision

In view of the above and Article 5:37 Awb, the AP notes that:

i.

Menzis has not fully complied with the first sentence of the order subject to periodic penalty payments in combination with load part 1 from the decision of 15 February 2018.

Menzis thus forfeited a penalty of €50,000.00.

II.

The AP will proceed to collect the penalty of €50,000.00 forfeited by Menzis.

The AP will hand over the aforementioned claim to the Central Judicial Collection Agency (CJIB). Bee in the absence of timely payment, the outstanding amount will be increased by the reminder and any collection costs.

## 7. Finally

In connection with Article 5:37 Awb, Vrijbit receives a copy of this decision as an interested party. This does not include data that makes it possible to identify employees or customers of Menzis.

If you have any questions about this letter, please contact the contact person mentioned above.

13/14

Date

January 9, 2019

Our reference

[CONFIDENTIAL]

A copy of this letter has also been emailed to [Toezicht@menzis.nl](mailto:Toezicht@menzis.nl).

Yours faithfully,

Authority for Personal Data,

e.g.

Mr. A. Wolfsen

Chair

If you do not agree with this decision, you may within six weeks of the date of dispatch of the decision pursuant to the General Administrative Law Act to file a notice of appeal with the Central Netherlands District Court, where these proceedings have already taken place

is pending. You must enclose a copy of this decision. Submitting a notice of appeal suspends the operation of this decision does not end.

14/14