



AVOCATUL POPORULUI
RĂGISTRATURĂ GENERALĂ
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Brussels, 1/07/2020
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Dear Ms Weber,

Thank you for your inquiry concerning our initiative with mobile network operators and the provision of aggregated and anonymised mobile phone location data. The European Commission has indeed asked European mobile network operators to share anonymised and aggregated data with its Joint Research Centre (JRC).

The objective of the initiative is to deliver insights that can help understand the spatial dynamics of COVID-19, qualify the impact of physical distancing measures on mobility, including the phasing out of such measures, feed epidemiological models and models to estimate the economic costs of different interventions, and the impact of specific control measures on intra-EU cross border flows, due to the pandemic.

We aim to work with at least one operator per Member State, to cover the entire EU. The European Commission is holding discussions at a technical level with mobile network operators that have offered to provide data, including data covering Romania.

The request to the mobile network operators is strictly limited to anonymous data and will in no way lead to tracing individuals. The Commission is not in possession nor will seek to utilise any other database or technical means that could theoretically lead to the unintended re-identification or identification of individuals.

Following the advice of the European Data Protection Supervisor (EDPS) in his letter of 20 March 2020, the JRC has put in place means and a due process to securely host and process the data, and has offered secure encrypted transmission to the mobile network operators. Before using the data, the JRC carries out a reasonability test on the aggregation and anonymisation of the data delivered by the mobile network operators. It does not share the data with any third party and data access is only granted to a limited number of JRC research staff.

Ms Renate WEBER
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The JRC will retain the data for no longer than 90 days or until the end of the COVID-19 crisis, depending on which date is earlier. This period can be extended, based on an agreement of the telecommunication operators, if the COVID-19 crisis is still ongoing.

Before launching the initiative, the Commission consulted the EDPS and the approach it has taken is in line with the European Data Protection Board Guidelines on the use of location data and contact tracing tools in the context of the COVID-19 outbreak adopted on 21 April 2020.

The Commission will share the insights of the analysis with authorities in the Member States and the European Centre for Disease Prevention and Control. Insofar as we are aware, no other EU entity has requested data from mobile operators.

Independently of the Commission's initiative, a number of Member States have requested access to anonymised and aggregated mobility data from mobile network operators active in their countries, to help in the fight against COVID-19. In some countries, access to the data is based on voluntary agreements, while in others the requests are based on existing or new legislation.

We would like to draw your attention to the Commission Recommendation to support exit strategies through mobile data and apps, adopted on 8 April 2020. The Commission is also supporting the EU Member States in the eHealth Network in the development of a Common EU Toolbox focusing on, amongst other things, a common approach for modelling and predicting the evolution of the virus through anonymised and aggregated mobile location data.

The Commission also published a Guidance on Apps supporting the fight against COVID 19 pandemic in relation to data protection. You may also be interested in the Joint European Roadmap towards lifting COVID-19 containment measures.

In case you have any further question, we would like to invite you to contact Cristina Maier (Cristina.MAIER@ec.europa.eu), DG CONNECT, Unit G1 Data Policy and Innovation.

Yours sincerely,



Kim Jorgensen



Renate Nikolay