



EUROPEAN COMMISSION  
DIRECTORATE-GENERAL FOR HEALTH AND FOOD SAFETY

Health systems, medical products and innovation  
**The Director**

Brussels  
SANTE.DDG1.B.3/AR/IMG/AEJ/aj

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**Subject: COVID-19 Contact tracing gateway system**

Dear Ms. Massé, Dear Ms. Simon,

I would like to thank you for your letter of 22 February 2021 on the interoperability of contact tracing and warning apps in the European Union.

The Commission has been intensively working with the Member States to ensure interoperability and coordination in relation to these apps since the beginning of the pandemic. The following are the actions put in place so far:

-April 2020: the eHealth Network adopted an **EU toolbox on contact tracing apps** in the EU's fight against COVID-19 setting out the foundations of a common pan-European approach to contact tracing and warning apps<sup>1</sup>;

-May 2020: Member States delivered **guidelines on interoperability** of approved contact tracing apps in May 2020<sup>2</sup>;

-June 2020, Member States, with the support of the Commission, agreed on a set of **technical specifications to ensure a secure exchange of information** between national contact tracing apps based on a decentralised architecture<sup>3</sup>. Based on these technical specifications, the Commission, on behalf of EU Member States, deployed an EU-wide interoperability system, the **European Federation Gateway Service (EFGS)**, to ensure interoperability of EU contact tracing and warning apps which are based on decentralised systems<sup>4</sup>. This would allow citizens travelling within the EU to be notified if they were in contact with a COVID-infected person while being in another Member State.

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<sup>1</sup> [https://ec.europa.eu/health/sites/health/files/ehealth/docs/covid-19\\_apps\\_en.pdf](https://ec.europa.eu/health/sites/health/files/ehealth/docs/covid-19_apps_en.pdf)

<sup>2</sup> [https://ec.europa.eu/health/sites/health/files/ehealth/docs/contacttracing\\_mobileapps\\_guidelines\\_en.pdf](https://ec.europa.eu/health/sites/health/files/ehealth/docs/contacttracing_mobileapps_guidelines_en.pdf)

<sup>3</sup> Basic interoperability specifications:

[https://ec.europa.eu/health/sites/health/files/ehealth/docs/contacttracing\\_mobileapps\\_guidelines\\_en.pdf](https://ec.europa.eu/health/sites/health/files/ehealth/docs/contacttracing_mobileapps_guidelines_en.pdf)

Detailed interoperability specifications:

[https://ec.europa.eu/health/sites/health/files/ehealth/docs/mobileapps\\_interoperabilitydetailedelements\\_en.pdf](https://ec.europa.eu/health/sites/health/files/ehealth/docs/mobileapps_interoperabilitydetailedelements_en.pdf)

<sup>4</sup> [https://ec.europa.eu/info/live-work-travel-eu/coronavirus-response/travel-during-coronavirus-pandemic/mobile-contact-tracing-apps-eu-member-states\\_en](https://ec.europa.eu/info/live-work-travel-eu/coronavirus-response/travel-during-coronavirus-pandemic/mobile-contact-tracing-apps-eu-member-states_en)

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As underlined in the Commission Recommendation<sup>5</sup> of 8 April 2020, the EU Toolbox<sup>6</sup> and the related Commission guidance<sup>7</sup>, the Commission supported by the Member States has recommended fully privacy-compliant and interoperable contact tracing and warning apps. In particular, the contact tracing applications participating in the gateway should have a voluntary character. Member States are joint controllers for the processing in the gateway. Collectively, with the support of the Commission, they ensure that each new Member States joining the gateway complies with the data protection rules.

**-Since October 2020**, Member States have been joining the gateway gradually. Fourteen Member States are currently interoperable through the gateway<sup>8</sup> and other six are in the process of onboarding. Updates about new Member States that have joined the gateway are also regularly published on the Directorate General for Health and Food Safety (DG SANTE) dedicated webpage<sup>9</sup>.

To support the joint controllers in complying with their obligations under Article 35 of the GDPR, the European Commission has prepared a document providing information on the EFGS that can be used by the Member States as a component of their respective own Data Protection Impact Assessment for the exchange of personal data via the gateway<sup>10</sup>. Such document is also available on the above-mentioned dedicated webpage.

The enforcement of data protection rules in the EU is the responsibility of the Member States' data protection authorities. The Commission as the guardian of the Treaties monitors that Member States comply with EU law. So far the Commission is not aware of any data sharing between national contact tracing apps and quarantine enforcement applications.

Finally, I would like to take this opportunity to refer you to the official webpage of the Commission, where you can find more information on the national contact tracing apps developed in the Member States<sup>11</sup>.

Yours sincerely,

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<sup>5</sup> C (2020) 2296 final. Recommendation on a common Union toolbox for the use of technology and data to combat and exit from the COVID-19 crisis.

[https://ec.europa.eu/info/sites/info/files/recommendation\\_on\\_apps\\_for\\_contact\\_tracing\\_4.pdf](https://ec.europa.eu/info/sites/info/files/recommendation_on_apps_for_contact_tracing_4.pdf).

<sup>6</sup> EU toolbox on mobile applications to support contact tracing in the EU's fight against COVID-19. [https://ec.europa.eu/health/sites/health/files/ehealth/docs/covid-19\\_apps\\_en.pdf](https://ec.europa.eu/health/sites/health/files/ehealth/docs/covid-19_apps_en.pdf).

<sup>7</sup> Communication from the Commission Guidance on Apps supporting the fight against COVID 19 pandemic in relation to data protection of 16.04.2020, available at:

[https://ec.europa.eu/info/sites/info/files/5\\_en\\_act\\_part1\\_v3.pdf](https://ec.europa.eu/info/sites/info/files/5_en_act_part1_v3.pdf)

<sup>8</sup> [https://ec.europa.eu/info/live-work-travel-eu/coronavirus-response/travel-during-coronavirus-pandemic/mobile-contact-tracing-apps-eu-member-states\\_en](https://ec.europa.eu/info/live-work-travel-eu/coronavirus-response/travel-during-coronavirus-pandemic/mobile-contact-tracing-apps-eu-member-states_en)

<sup>9</sup> [https://ec.europa.eu/health/ehealth/covid-19\\_en](https://ec.europa.eu/health/ehealth/covid-19_en)

<sup>10</sup> [https://ec.europa.eu/health/sites/health/files/ehealth/docs/efgs\\_dpia\\_en.pdf](https://ec.europa.eu/health/sites/health/files/ehealth/docs/efgs_dpia_en.pdf)

<sup>11</sup> [https://ec.europa.eu/info/live-work-travel-eu/coronavirus-response/travel-during-coronavirus-pandemic/how-tracing-and-warning-apps-can-help-during-pandemic\\_en](https://ec.europa.eu/info/live-work-travel-eu/coronavirus-response/travel-during-coronavirus-pandemic/how-tracing-and-warning-apps-can-help-during-pandemic_en)

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