

The Italian Data Protection Authority's guidelines for the workplace vaccination campaign

1

Consent to join the campaign: the employer cannot gather – either directly from the data subjects, or through the occupational health and safety doctor or other healthcare professionals or facilities – **information on vaccination-related issues**, including the worker's intention to join the campaign, whether or not the vaccine has been administered and other healthcare information on the worker.

2

Ordering the doses of the vaccine: on the indication of the healthcare professional in charge, **the employer will simply ask the public health authority (ASL) for the required number of doses of the vaccine.**

3

Vaccination plan:

The employer may provide the healthcare professional in charge with indications and criteria for planning the vaccination sessions, **without processing the personal data** concerning the consent of identified or identifiable workers.

4

Administering the vaccine: the vaccine will have to be administered at the premises identified by the employer, which must be such to **prevent, insofar as possible, co-workers or any third parties from becoming aware of the identity of the employees being vaccinated.**

5

Accounting for absence from work: the time required to be vaccinated **will be treated as working time.** Absence from work will be accounted for, if required, **in the ordinary manner** as required by the applicable national collective bargaining agreement or by a generally-worded note issued by the vaccinator.