

(English version)

**Question for written answer E-001681/25
to the Commission
Emmanouil Fragkos (ECR)
(25 April 2025)**

Subject: Privatisation of preventive screening

The Greek Government is privatising preventive newborn screening by 2029, aiming to adopt a genetic analysis method through human genome sequencing instead of traditional biochemical testing. The process will be entrusted to RealGenix and Beginnings, with the research results belonging to these companies, which raises serious ethical and technical issues, as genetic analysis is still at the pilot stage worldwide.

The ‘programmatic agreement’ between the Ministry of Health and the two companies provides for the conduct of genetic testing for 100,000 newborns by 2029, without prior scientific evaluation or opinion from competent institutions. This process raises concerns about the management of personal data, as well as the possible exploitation of citizens’ genetic material by private companies, with a potential benefit for multinational pharmaceutical and insurance companies. In the absence of transparency and safeguards in a programmatic agreement between the public sector and companies for the genomic analysis of 100,000 newborns, despite the official assurance of compliance with the GDPR, the genetic material becomes the property of the company without clear guarantees for its non-commercial exploitation.

In view of this:

1. Are the strict confidentiality clause, the lack of public access to the agreement and the opacity of funding compatible with the objective of protecting the personal data of future Greek children?
2. Has the Commission examined whether the ‘programmatic agreement’ meets European standards for the protection of the GDPR?

Submitted: 26.4.2025

**Answer given by Mr McGrath on behalf of the European Commission
(19 June 2025)**

The protection of personal data in the EU is ensured by the General Data Protection Regulation (GDPR) ⁽¹⁾ which applies to both public and private organisations in the EU.

Genetic data fall within the special categories of personal data which can be processed only if one of the conditions in Article 9(2) GDPR is fulfilled. This provides an additional layer of protection considering the potential risks arising from the processing of this type of data.

Following the GDPR risk-based approach, controllers and processors must put in place adequate technical and organisational measures to ensure a level of security appropriate to the risk (Articles 5(1)(f) and 32 GDPR).

If the envisaged processing is likely to result in a high risk, the controller has to conduct a Data Protection Impact Assessment (DPIA), and in some situations, to consult the competent Data Protection Authority (DPA).

In line with Article 28 GDPR, the controller has to choose a processor that provides sufficient guarantees in terms of data protection.

The binding contract or other legal act governing their relationship shall stipulate, among others, that the processor must ensure that its staff authorised to process the data have committed themselves to confidentiality. The GDPR does not impose the public disclosure of the contract, nor the funding.

It follows that the Greek public authority, acting as controller, is responsible for ensuring that the data processing for the preventive screening meets the GDPR standards.

The monitoring and enforcement of the application of the GDPR falls within the competence of the national DPAs and courts, without prejudice to the Commission’s competences as guardian of the Treaties.

It is therefore for the Greek DPA to examine whether the ‘programmatic agreement’ complies with the GDPR.

⁽¹⁾ Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (GDPR), OJ L 119, 4.5.2016, p. 1-88.