Municipal response and Woo clarification

Full English reading translation of the anonymised covering message and letter of 16 October 2026. The Dutch original is authoritative. Only Michel Peen remains identifiable as a person.

Covering message received on 16 October 2026 at 16:37

Subject: 960865 letter regarding insufficient clarification. Dear Mr Peen, We are sending you a letter. Please see the attachment. Kind regards, Woo desk, Municipality of Heerlen.

Letter dated 16 October 2026 | Reference 960865

To: Mr M. Peen. Subject: Insufficient clarification. Team Legal Affairs. Personal contact details and the other individual’s name have been redacted.

Dear Mr Peen,

On 4 September 2026, we asked you to clarify your Woo request of 26 July 2026. You emailed us your clarification that same day.

Your request is still too general

In your clarification you state that your request concerns all documents directly related to the preparation, design, testing and deployment of Pulse-Twin and the Social Digital Twin, the Pulse Data Warehouse, the Pulse Data Engine/AI data engine, or a specific component thereof. We understand that under points B to H you are requesting only existing documents, but it remains unclear exactly which ones. The request is broad and therefore insufficiently focused, making it impossible for us to locate the documents you mean. The period from 1 January 2023 to 26 July 2026 is also too broad. Your request is therefore still insufficiently clear for us to process.

We ask you to identify the specific matter and documents to which your request relates by 23 October 2026 at the latest. If you do not respond within that period, or do not further clarify your request, we will leave your request unprocessed. Your response may be sent to the Woo desk [email address redacted].

Only with your cooperation can we arrive at a workable scope for the request. You are not available for a telephone discussion or a meeting at the town hall. You wish to conduct all communication in writing by email. To arrive at a specific request, we need more cooperation than we have received from you so far. We are making one final attempt to assist you in clarifying your request. Please provide unambiguous and clear answers to the following questions:

1. Project

Is it correct that your request relates only to the PULSE-TWIN project? Your request therefore no longer concerns all AI, all camera surveillance, or all digital projects within the Municipality of Heerlen?

2. Project phase and period

We do not understand which project phase and period your request concerns. In your email of 4 September 2026 you refer to the period from 1 January 2023 to 26 July 2026. At the same time, you request documents about the preparation, design, testing and deployment of Pulse Twin / Social Digital Twin. On 4 September 2026 you already received documents from us relating to the preparation and design of the project. We subsequently sent you missing documents 1a and 1b on 7 September 2026. Is it correct that you mean the implementation phase of the project in the period from 1 October 2025 to 26 July 2026?

By way of explanation: PULSE-TWIN is an experimental project currently in its start-up and design phase. The project started on 1 October 2025 and runs until 31 March 2029. Europe (EUI) has awarded the Municipality of Heerlen a grant to carry out the project during these 3.5 years. The project has three phases: 1. Exploration

phase (October 2025-June 2026). 2. Development phase (June 2026-October 2028). 3. Consolidation and completion phase (October 2028-March 2029).

3. Types of documents

Is it correct that you primarily wish to receive formal decision-making documents (memoranda, adopted minutes and decisions, reports)? That you are primarily interested in final versions? That you are not requesting information which is already public?

Information that does not exist

Within the PULSE-TWIN project there is no use of personal data, systems for tracking individuals, or facial recognition. The project works exclusively with aggregated, anonymised statistics at district and neighbourhood level (such as general Statistics Netherlands figures and reports about public space) to improve liveability. Nor is there any creation of individual citizen profiles, or any data-driven working. There is no tracking or profiling of individuals.

To the extent that your request asks for this, we cannot disclose this information because it does not exist. This also applies to your request for working algorithms, prompt sets and final evaluations. This information does not exist either.

Your seven governance questions

On 29 July 2026 you asked the mayor to answer seven governance questions. The questions and answers are set out below to help you clarify your request:

Question 1: Which data does the system collect about residents, and does it use individual-level data?

Answer: The system uses no personal data, no systems for tracking individuals and no facial recognition. In the Pulse-Twin project we process no data at individual level.

Question 2: How is the project prevented from becoming a surveillance system?

Answer: Pulse-Twin aims to generate insights that can improve liveability and safety in Heerlen’s neighbourhoods. No personal data, systems for tracking individuals or facial recognition are used. The municipality and its project partners naturally comply with all current laws and regulations in this project.

Question 3: How is the algorithm prevented from stigmatising neighbourhoods or groups?

Answer: Pulse-Twin does not process personal data. We also work with scientific experts from the Brightlands Institute for Smart Society using the ELSA methodology (Ethical, Legal and Social Aspects). This organisation advises the project on preventing bias.

Question 4: Who checks the algorithm’s decisions?

Answer: The technology supporting Pulse-Twin is intended to generate insights that can assist municipal officials, neighbourhood organisations and administrators. This means that a human is always in the loop, processing the information and then weighing up any decisions.

Question 5: How are privacy, legal matters and security checked?

Answer: Privacy assessments are carried out, for example in the form of DPIAs, and are checked by the Data Protection Officer (FG) and the security expert (CISO).

Question 6: What role do suppliers and project partners play?

Answer: All agreements with partners and suppliers are laid down in contracts. The roles of the local partners are listed on the website www.pulse-twin.com.

Question 7: How are residents and civil-society organisations involved?

Answer: The civil-society organisations Buurtteams and JENS are official project partners. Together with them, we will involve residents in various ways during the coming project period. All official information and frequently asked questions are transparently available on our official website www.pulse-twin.com.

Decision period remains suspended

Applying Article 4:15(1)(a) of the General Administrative Law Act (Awb), the decision period remains suspended. We will let you know within two weeks of receiving your response, or within two weeks after the deadline expires, whether we will process your request.

Yours faithfully, The Mayor and Municipal Executive of Heerlen, on their behalf, [personal name redacted], Manager, Team Legal Affairs. As this letter was created electronically, it has not been signed.