Sent reply and Woo clarification

16 October 2026, 17:14 | Full English reading translation of the anonymised sent reply and further clarification. Dutch originals authoritative. Only Michel Peen remains as a personal name.

Dear Legal Affairs Team,
Dear Mayor,

Thank you for your letter of 16 October 2026, reference 960865. I have read the information it contains. Below I address the Woo clarification and the governance response separately.

1. Woo request: specific clarification

Attachment 1 answers your three questions separately and sets out the project scope, fixed search period and specific documents to be located. My request concerns only PULSE-TWIN and its directly connected project components. The preparatory phase remains within scope. I do not request identical documents already supplied; the request continues to cover existing substantively different drafts, designs, assessments and missing attachments. Please add this clarification to case 960865 and resume processing. Please confirm receipt, the remaining decision period and the timetable for the first decision or partial decision.

2. Original seven governance questions

The questions under the heading about my seven governance questions in your letter are not the same as the seven questions in my email of 29 July 2026. Attachment 2 reproduces the original questions verbatim and identifies the missing or insufficiently specific elements for each. A clear example is my seventh question: it concerns how and when the municipal council will be informed about operation, risks, costs, results and expansion. Your seventh answer concerns participation by residents and civil-society organisations. That does not replace the original question.

I acknowledge your statements about aggregated data, the project phase, ELSA, human assessment and privacy assessments. I also request separate, verifiable answers following the original numbering, including the specific operational, tested and planned applications, the effect on monitoring and interventions, safeguards against self-reinforcing patterns in records, and the assessments actually completed and how follow-up is secured by the municipal executive.

Please also confirm in writing whether the mayor has seen my report and original questions, whether the answers in your letter are also given on his behalf, who is politically responsible, and whether the contact instruction of 5 October was given on his behalf.

Attachment 3 is the decision of 9 October 2026 on complaint 1017347. That complaint was upheld because feedback had not been provided before the complaint was lodged. I rely on the decision only for that established communication failure. The received response is taken into account substantively, but does not yet amount to complete restoration of the original response sought.

Please respond to the outstanding governance points by 19 October, or provide a specific, reasoned and reasonably short response date. On 19 October I will assess whether a final remedial notice remains necessary. The previously announced submission on 27 October to the National Ombudsman and the municipal council remains conditional on the actual answers and expiry of the remedial period actually set. The Woo clarification and statutory Woo decision periods are separate.

Please communicate exclusively in writing by email.

Kind regards,
Michel Peen

My books on Brave New Books: https://www.bravenewbooks.nl/michelpeen
My books on Amazon: https://www.amazon.com/author/michelpeen
My books on Bookmundo: https://publishnl.bookmundo.com/site/?r=userwebsite/index&id=michelpeenbooks/

Attachment 1 - further clarification of Woo 960865

Dear Mayor and Municipal Executive,
Dear Legal Affairs Team,

In response to your letter of 16 October 2026, reference 960865, I answer your three clarification questions below. This further specifies my Woo request of 26 July 2026 and clarification of 4 September 2026. I assess the passages on governance questions separately against my original questions of 29 July 2026.

1. Subject: PULSE-TWIN only

Yes. The subject is municipal decision-making about, and the actual preparation, design, testing and any deployment of, the specific PULSE-TWIN project in Heerlen. Social Digital Twin, PULSE Data Warehouse, PULSE Data Engine/AI data engine, AI copilot and Public Smart Safety Center are included only where a document develops, assesses, modifies or rules them out as part of this project. The request is not a general inventory of all municipal AI, cameras or digital projects.

2. Period and project phases

No, I do not limit the request to implementation from 1 October 2025. The fixed end date remains 26 July 2026. I specify the search period as follows:

a. 1 January 2023 to 30 September 2025: project-specific preparation only, including the EUI application and attachments and amendment/confirmation documents, grant and financing decisions, partner and procurement choices, project design, and the legal, privacy, ethical and security assessments recorded for those purposes. Other municipal projects are excluded.

b. 1 October 2025 to 26 July 2026: PULSE-TWIN exploration and development activities, insofar as recorded in the documents specified below. The phases you describe do not justify excluding preparatory records, designs or assessments from scope.

This request does not seek documents dated after 26 July 2026. Nor do I request an unrestricted search before 1 January 2023; older records are included only where their demonstrable inclusion, citation or use as a current basis within this fixed period meets the terms already specified on 4 September.

3. Final versions, drafts and records already public

Final decisions, adopted minutes and current documents have priority. The request is not limited to these: a substantively different draft, design, recommendation, test report or substantive email is included where it records one of the project choices or assessments defined below. Identical copies, drafts without substantive differences and purely administrative meeting or scheduling messages are excluded.

Identical documents already supplied on 4 and 7 September, including 1a and 1b, need not be supplied again. The request continues to apply to missing attachments or substantively different versions. For records already public elsewhere, a direct working link identifying each document’s title, date and version is sufficient; a general website reference does not show which requested record has been covered.

4. Specific records to be located within this subject

Categories B to H in my clarification of 4 September are not new general themes. They concern the following specific project records, insofar as existing within the period defined above:

B. The project description, roadmap, milestones and progress records current on 26 July 2026, together with decisions and associated substantive minutes/action lists concerning scope, pilots, start, changes, scaling or suspension. This includes recorded choices to implement the Public Smart Safety Center, not implement it, defer it or implement it differently, and departures from the submitted project proposal.

C. Architecture diagrams, system designs, data models, API and data-flow/integration overviews for PULSE-TWIN, the Data Warehouse and Data Engine; inventories of source, test, training, validation and production datasets with recorded origins, data categories, granularity, purpose, access, logging, deletion, recipients, updates and retention; technical arrangements for aggregation, anonymisation, data minimisation, re-identification risk and GDPR/Wpg

separation. Camera, police, enforcement officer, reporting, care, youth, welfare or sensor data only where a specific project linkage has been investigated, designed, tested, authorised or excluded.

D. Existing descriptions of models, algorithms, decision rules and the AI copilot; design, prototype and test documentation and substantively recorded instructions, validation and bias/audit assessments; recorded human review, authority to override, explainability and recording of whether system recommendations are followed; project-specific assessments for the Algorithm Register and the AI Act.

E. PULSE-TWIN DPIAs, draft/pre-DPIAs, privacy quick scans, fundamental-rights, proportionality, subsidiarity, ELSA, risk and security assessments, together with project-specific advice from the Data Protection Officer, CISO, legal affairs and external experts and recorded follow-up. Existing project-specific establishment and working records of an ethics review body are also included.

F. Project-specific market consultation, procurement, commissioning and award records, contracts and amendments, cooperation, processing and data-sharing agreements, service-level agreements and exit arrangements, including recorded roles, responsibility for data/models/source code, audit rights, reuse, deletion and portability.

G. Specific pilot/test plans and available results, working instructions/training, participation plans and resident information, participation reports and processing of input, baselines, KPIs, evaluation plans and existing interim evaluations, stopping/change criteria and existing project-specific complaints or signals about stigmatisation or unequal treatment. I do not request future end results or evaluations that have yet to be made.

H. Existing records on the scope and actual search in the earlier PULSE-TWIN Woo file: scoping agreements, search/inventory/result lists and any discussion notes on which alleged agreement to restrict that earlier request is based.

5. Existing records and a verifiable search

I record as your position your statement that no personal data, individual citizen profiles, working algorithms, prompt sets or final evaluations are present. I do not request the creation of non-existent records. That statement does not automatically answer whether the existing designs, assessments, source inventories or agreements described above are present. Please distinguish for each category: not created/existing; not located after a search; already supplied/public; or wholly/partly withheld with the applicable reasons.

Start with the PULSE-TWIN project file, steering group/project environment and procurement/contract files. Where relevant, include substantive business email and Teams/SharePoint of project leadership, data/architecture, safety/social domain, Data Protection Officer/privacy, CISO, legal affairs and procurement. Use project and component names; use generic terms such as DPIA or ELSA only in combination with the specific project connection. Please give a verifiable explanation in the decision of the functions, systems, periods and search methods actually consulted. I do not request new substantive analyses or research reports.

6. Cooperation, processing and decision period

I demonstrably cooperate in writing with clarification as contemplated by Article 4.1(4)-(6) of the Woo. I again answer your questions separately and define the project, period and records specifically. If one element remains unclear, please identify the exact passage and required choice and make a specific proposal, providing the assistance required by Article 4.1(5) of the Woo. Meanwhile, continue processing the independently clear elements.

I agree to prioritisation and partial decisions: project scope/decisions and data architecture first, followed by assessments/human oversight, contracts, pilots/participation and the search. This does not withdraw other requested elements or constitute advance consent to additional delay. I request resumption of processing and written confirmation of receipt, the remaining decision period and the date of the first decision or partial decision. If you maintain a suspension, please give its specific statutory basis, start and end dates, and calculation of the remaining period.

Please communicate exclusively in writing by email.

Kind regards,
Michel Peen