

PUBLIC DOCUMENT | ENGLISH TRANSLATION

Anonymised Woo decision concerning PULSE-TWIN

Decision of the Municipality of Heerlen dated 18 June 2026

**IMPORTANT
TRANSLATION NOTE**

This is an independent English translation of the anonymised Dutch Woo decision dated 18 June 2026, reference 699799. It is provided solely for public information and international readers. It is not an official translation by the Municipality of Heerlen. The Dutch original is the authoritative document and governs any legal interpretation.

ORIGINAL DATE	18 June 2026
REFERENCE	699799
REQUEST DATE	25 February 2026
ORIGINAL LANGUAGE	Dutch
PUBLIC REDACTIONS	Requester and personal contact details
TRANSLATION PUBLISHED	10 August 2026

Independent public-interest dossier by Michel Peen

TRANSLATED BODY OF THE ORIGINAL DECISION

Decision on your Woo request dated 25 February 2026

DATE	18 June 2026
REFERENCE	699799
TEAM	Legal Affairs
TELEPHONE	14 045 / [personal direct number anonymised]

Dear [anonymised],

In your Woo request of 25 February 2026, received on 25 February 2026, you invoked the Dutch Open Government Act (Wet open overheid, Woo) and requested information about the decision-making, development and use of the Pulse Twin data model. More specifically, you requested documents concerning:

1. the decision-making and the associated legal and ethical advice relating to the Pulse Twin pilot;
2. the application for, substantiation of and award of the European grant for this project; and
3. project plans and technical documentation showing how the model works, the data and data links used, the applications, and the organisations, cooperation partners and consultants involved.

Legal framework

We are treating your request as a request under the Dutch Open Government Act (Woo). The relevant provisions of the Woo are included in Annex 1 to this decision.

Document inventory

In response to your request, we carried out a search within the municipal organisation. The search term 'Pulse Twin' was used in Djuma (our case-management system), the project folder on the V drive and the Microsoft Teams environment for the Pulse Twin project.

This search identified 11 documents falling within the scope of your request, as well as a document in which we explain the Woo decision. The 11 documents are listed in the inventory attached to this decision as Annex 2.

Views of interested parties

We gave interested parties an opportunity to submit their views on the proposed disclosure of documents. We took the views received into account in balancing the interests involved. Those views were followed.

Considerations

Economic or financial interests of the State, other public-law bodies or administrative authorities

Under Article 5.1(2)(b) of the Woo, we may refuse information where disclosure would harm the economic or financial interests of the Municipality or other public authorities involved, and that interest outweighs the interest in disclosure.

This applies to parts of the documents. Disclosure could provide insight into financial arrangements, grant accountability, contractual arrangements or the negotiating positions of the Municipality and/or the parties involved. In this case, we consider the protection of those interests to outweigh the interest in disclosure. We therefore do not disclose that information.

Respect for private life

Under Article 5.1(2)(e) of the Woo, we may refuse information where disclosure would harm privacy and that interest outweighs the interest in disclosure.

The documents contain personal data such as names, email addresses, telephone numbers, signatures and other information that can identify natural persons directly or indirectly. We consider it important to protect the privacy of those concerned. We therefore do not disclose this personal data.

Security of persons and businesses and the prevention of sabotage

Under Article 5.1(2)(h) of the Woo, we may refuse information where disclosure would impede the security of persons and businesses or facilitate sabotage, and that interest outweighs the interest in disclosure.

Parts of the documents contain technical and security information concerning the design, operation and security of systems and data processing. Disclosure could reveal vulnerabilities or security measures. We consider the protection of this information to outweigh the interest in disclosure and therefore do not disclose it.

Decision

Partial disclosure

In view of the above, the documents are partially disclosed to you, subject to Chapter 5 of the Woo.

Yours faithfully,
Municipal Executive of Heerlen,
on its behalf,
[name and function anonymised]

This letter was generated electronically and has therefore not been signed.

Objection

Do you disagree with this decision?

You may lodge an objection. You must do so within six weeks after the decision has been notified; otherwise, the Municipality may be unable to consider the objection. This also applies if you are still consulting the official handling the matter. An objection may be lodged digitally or in writing.

Digital submission

Use the digital form at www.heerlen.nl/bezwaarschrift-indienen. DigiD is required. Follow the steps and consent to further contact by email; you will then no longer receive paper correspondence.

Important: an objection cannot be lodged by sending an email to the Municipality's general email address.

Written submission

You may also send the notice of objection by post to: Municipal Executive of the Municipality of Heerlen, PO Box 1, 6400 AA Heerlen, the Netherlands. During office hours, it may also be handed in at the reception desk of the municipal offices, Geleenstraat 27.

The notice of objection must include at least:

- the decision against which you are objecting;
- the date and reference number of that decision, with a copy of the decision enclosed;
- your name, address and place of residence;
- the reasons for your objection;
- your signature; and
- if you are objecting on behalf of another person, a written authorisation.

Interim relief

Does the decision cause you immediate difficulties, and have you lodged an objection? You may ask the court for a temporary measure. This is known as interim relief. Costs are payable for such an application.

Send the application to: Preliminary Relief Judge, Limburg District Court, PO Box 950, 6040 AZ Roermond, the Netherlands. The application may also be submitted digitally. Further information is available at www.rechtspraak.nl under administrative-law procedures for interim relief.

Explanation of redaction grounds

This document may contain sections that have been made unreadable. The information was withheld under the Dutch Open Government Act (Woo). The letter shown with a redaction corresponds to the applicable ground below.

J - Article 5.1(2)(e)

The interest in disclosing this information does not outweigh the interest in respecting the private life of the persons concerned.