

UNOFFICIAL ENGLISH READING TRANSLATION

Clarification of Woo request 960865

PULSE-TWIN, the Social Digital Twin, AI and digital data processing

Sender: Michel Peen

Recipient: Mayor and Municipal Executive of Heerlen / Legal Affairs Team

Sent: 4 September 2026 by email

Subject: response to the municipal letter dated 4 September 2026, reference 960865

This is an unofficial English reading translation of the Dutch clarification sent to Heerlen. The Dutch original remains authoritative. Personal contact details, the recipient's email address and BCC transmission data have been omitted.

Dear Mayor and Municipal Executive,

Dear Legal Affairs Team,

In response to your letter of 4 September 2026, reference 960865, I hereby clarify my request of 26 July 2026 under the Dutch Open Government Act (Woo). This clarification replaces the original wording wherever a narrower scope is expressly stated below.

1. Background and purpose

The purpose is public scrutiny of the actual preparation, design, testing and use of PULSE-TWIN and the Social Digital Twin, in particular:

- which data, systems, algorithms and suppliers are used or have been specifically planned;
- which decisions have been taken about them;
- which legal, privacy, fundamental-rights, ethical and security safeguards have been assessed;
- how human oversight, evaluation and legal protection are organised.

The request therefore does not cover all AI, all camera surveillance or all digital projects of the Municipality of Heerlen. It covers only records with a direct and demonstrable connection to PULSE-TWIN, the Social Digital Twin, the PULSE Data Warehouse, the PULSE Data Engine/AI data engine or a specific component thereof.

2. Fixed time period

The search period is 1 January 2023 through 26 July 2026.

I do not request a general or unlimited search for records predating 1 January 2023. An older record is covered only where, during the stated period, it was demonstrably:

- added to the PULSE-TWIN project file;
- cited in a decision, design, agreement or assessment; or

- still used as a governing basis for the current project design.

Records created after 26 July 2026 are not covered by this Woo request.

3. Existing records requested

Records already supplied need not be provided again unless they are a substantively different version or a missing annex.

A. Records missing from the municipal inventory transfer

- 01a. Application Form_FINAL.pdf;
- 01b. Application form confirmation Sheet.pdf.

These two records appear on the inventory supplied by the Municipality but were absent from the transfer of 4 September 2026. I request that they be supplied digitally as soon as possible.

B. Actual project scope, decisions and changes

- the project description, roadmap, milestone schedule and progress reports in force on 26 July 2026;
- decisions by the Municipal Executive, management, steering group or project team concerning launch, scope, pilots, deployment, scaling, amendment, temporary suspension or termination;
- agendas, decision lists, minutes and action lists insofar as one of those decisions was substantively discussed;
- records showing which components of the project proposal are actually being implemented, which are not or will be implemented later, and why;
- specifically, decision-making concerning the Public Smart Safety Center not being implemented immediately and any later or alternative implementation.

C. System architecture, data sources and data flows

- current and earlier substantively different architecture diagrams, system designs, data-flow diagrams, data models and API/interface inventories;
- the inventory of source, test, training, validation and production datasets, including, where recorded: owner, provenance, purpose, data categories, geographical granularity, update frequency, retention period, recipients and status;
- designs and specifications for the PULSE Data Warehouse and PULSE Data Engine/AI data engine;
- records on anonymisation, pseudonymisation, aggregation, data minimisation, re-identification risk and separation between GDPR and Dutch Police Data Act data;
- records on access roles, authorisations, logging, retention and deletion;
- records concerning camera, police, municipal enforcement, notification, care, youth, welfare or sensor data only insofar as a connection to PULSE-TWIN was specifically examined, designed, tested, authorised or excluded.

D. AI, algorithms and human oversight

- descriptions of models, decision rules, prompts or instruction sets, classifications and intended outputs that are used or specifically planned for testing;
- records stating for each component whether it is merely intended, a prototype, pilot, test or operational application;
- test, validation, acceptance and audit reports, including available information on accuracy, error rates, bias, discrimination risks and geographical profiling;
- records on human assessment, authority to depart from system output, escalation, explainability and the recording of decisions to follow or disregard system advice;
- records concerning the Dutch Algorithm Register and classification under the EU AI Act.

E. Privacy, fundamental rights, ethics, legality and security

- DPIAs, draft DPIAs, pre-DPIAs, privacy quick scans, fundamental-rights impact assessments, proportionality and subsidiarity assessments, and ELSA assessments;
- advice, conditions or warnings issued by the Data Protection Officer, privacy staff, the CISO/information-security function, the legal department and external experts, together with the recorded follow-up;
- founding and working records of an ethics committee or comparable review body, insofar as such a body exists or was specifically prepared for PULSE-TWIN;
- security and risk assessments insofar as responsible disclosure is possible. Where the Municipality considers that disclosure of a part would specifically harm current security, I request partial disclosure and a specific reason for each passage withheld.

F. Suppliers, partners and agreements

- procurement records, market consultations, instructions, award decisions, contracts, addenda, data-processing agreements, data-sharing agreements, SLAs and exit arrangements specifically prepared or concluded for PULSE-TWIN;
- arrangements concerning data, models, source code, intellectual property, subprocessors, audit rights, model updates, reuse, deletion and portability;
- records concerning the technical or data-related role of suppliers, knowledge institutions and project partners.

G. Pilots, residents, professionals and evaluation

- pilot plans and results, user research, work instructions and training materials for the professionals involved;
- records stating which interventions or decisions may be influenced by system outputs;
- participation plans, resident information, reports and records showing how input was addressed;
- baselines, KPIs, evaluation plans, interim evaluations and criteria for suspension, amendment or scaling;
- anonymised complaints, signals or evaluations concerning stigmatisation, chilling effects, unequal treatment or loss of trust, only insofar as they actually exist and concern PULSE-TWIN.

H. Earlier scoping and search

This part is limited to existing records that factually document the scope and search conducted in the earlier PULSE-TWIN Woo file:

- the proposed and finally agreed scope;
- search terms used, systems searched and roles/organisational units involved;
- existing inventories and result lists;
- existing meeting or telephone notes insofar as they support an assertion that the requester agreed to a limitation.

4. Matters outside the request

The following fall outside the request:

- records without a direct connection to PULSE-TWIN;
- purely administrative scheduling messages without substantive information;
- completely identical copies and fully quoted duplicates;
- earlier drafts that do not differ substantively from the final version;
- general records on AI, camera surveillance, public order or municipal IT that were not used or prepared for PULSE-TWIN.

5. Search method

For a verifiable search, I request that at least the relevant project files, business email, Teams/SharePoint or comparable collaboration environments, and procurement/contract files be searched for the functions involved in:

- PULSE-TWIN project management and steering;
- data, architecture and information management;
- safety and the social domain;
- privacy/the Data Protection Officer;
- information security/the CISO;
- legal affairs, procurement and contract management.

Relevant search terms include: PULSE-TWIN, Pulse Twin, Social Digital Twin, PULSE Data Warehouse, PULSE Data Engine, AI data engine, AI copilot, Public Smart Safety Center, PSSC, ELSA, DPIA and the specific names of suppliers and project partners.

Please describe in the decision which organisational units, functions, systems, period and search terms were actually searched. This request concerns existing records only; I do not require new substantive analyses to be created.

6. Priority and partial decisions

I agree to phased processing and partial decisions, without relinquishing the clarified scope above and without agreeing in advance to an extension of statutory deadlines.

The order of priority is:

1. missing records 01a and 01b;
2. the current project scope and decisions on departures from the project proposal;
3. system architecture, datasets and data flows;
4. AI/algorithm documentation, human oversight, DPIA/ELSA and advice from the Data Protection Officer, CISO and Legal Affairs;
5. supplier and partnership agreements;
6. pilots, participation, evaluation and the earlier search.

7. Written communication

I am not available for telephone consultation or a meeting at City Hall. I request that all communication take place in writing by email. This clarification provides the requested background, period, scope, record categories, exclusions and priorities.

If the Municipality nevertheless considers a specific part unclear, please state by email:

- the exact passage or category that is unclear;
- the alternative scope options between which I am asked to choose; and
- why that choice is necessary for the search.

Any remaining question about one component should not delay processing of the other components that are sufficiently clear and can be handled independently.

Finally, I request that you:

- confirm receipt of this clarification;
- confirm that processing resumes upon receipt;
- supply the missing records 01a and 01b; and
- provide a timetable for partial decisions and the date of the first partial decision.

Yours faithfully,

Michel Peen

Written communication by email only

PULSE-TWIN Heerlen - independent dossier

<https://pulse-twin-heerlen.nl>