

Navigating EHDS Implementation Aligning Health Data Governance with **NIS2 Cybersecurity Standards** in Cyprus

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Health is the first common EU data space

Part of the EU's wider strategy for common European data spaces across strategic sectors.

The European strategy for data focuses on creating common European data spaces for sectors such as health, agriculture, industry, energy, and transport. Data spaces are ecosystems where providers, intermediaries, and users can access and share data, making more data available across the economy and society, while keeping control with the people and organisations who generate it.

Health is the first sector where this model is being put into practice at full scale — through the European Health Data Space.

The EHDS timeline

Regulation (EU) 2025/327 — in force since 26 March 2025, applying in stages.

26 MAR 2027

26 MAR 2029

26 MAR 2031

General application

National authorities, governance structures, and core infrastructure must be operational.

Cross-border primary use for all

Patient Summary and ePrescription/eDispensation become mandatory cross-border services in every Member State.

Original Clinical Documents

Laboratory results, medical imaging reports, and hospital discharge reports (ORCD) join the mandatory scope.

EHDS in a nutshell

Three components, working together.

PRIMARY USE

Use of data for the delivery of healthcare.

Improving patients' access to their own health data and ensuring seamless exchange for continuity of care, building on the existing MyHealth@EU infrastructure.

SECONDARY USE

Use of data for research, innovation, and policy-making purposes.

Common European rules on who must make which data available, for which purposes, and under which conditions, via HealthData@EU.

EHR REQUIREMENTS

Creating a single market for electronic health record systems, supporting both primary and secondary use.

Product rules covering interoperability and logging, fully harmonised across the EU.

Primary Use

Where does Cyprus stand today?

What is coming before the end of the year?

Primary use is already live in Cyprus

NCPeH Cyprus operates as the national contact point within MyHealth@EU.

● **ePrescription**

Live cross-border today.

● **eDispensation**

Live cross-border today.

● **Patient Summary**

Live cross-border today.

● **Original Clinical Documents**

Discharge reports, laboratory results, and medical imaging reports — added by the end of 2026.

What this means for patients and professionals

FOR PATIENTS

- Immediate, free access to their own health data in the priority categories
- Easy sharing with health professionals, including cross-border
- Ability to see who accessed their data
- Delegated access — appointing a related person to act on their behalf

FOR HEALTH PROFESSIONALS

- Easier, quicker access to their patients' data, including cross-border
- A common European electronic health record exchange format, improving interoperability across systems

Primary use: Cyprus's roadmap

END OF 2026

2029

Original Clinical Documents added

Discharge reports, laboratory results, and medical imaging reports go live on NCPeH Cyprus.

EU-wide mandatory milestone

The regulatory deadline by which every Member State must offer Patient Summary, ePrescription and eDispensation cross-border — Cyprus already does.

By the time the 2029 deadline arrives, Cyprus's primary-use infrastructure will already be running the full data set.

Secondary Use

Not yet operational in Cyprus.

How does it work, and what are we building?

Secondary use: how it is meant to work

Common European rules for research, innovation, and policy-making.

Common rules

Who make which data available, for which purposes, and under which conditions.

Common infrastructure

HealthData@EU connects national Health Data Access Bodies across the EU.

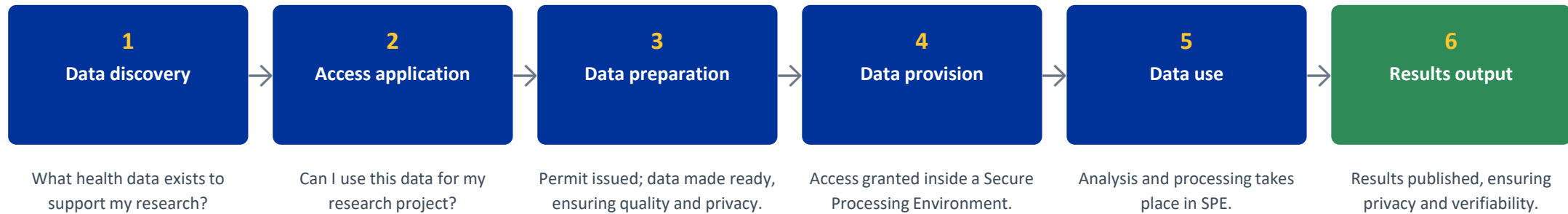
No consent required

Access does not require patient consent — but citizens can opt out of the reuse of their health data.

Permits, not free access

Every use goes through a permit process, with common safeguards and a secure processing environment (SPE).

The secondary-use journey



Secondary use in Cyprus: CY-EHDS-2ND is already under way

An EU4Health-funded project building Cyprus's Health Data Access Body.

The project

CY-EHDS-2ND, also referenced as EHDS2-CY.

Programme: EU4Health

Duration: December 2023 – November 2027 (48 months)

Partners: the National eHealth Authority of Cyprus, coordinating, together with the University of Cyprus.

Its purpose

To establish Cyprus's national Health Data Access Body (HDAB) — the organisation responsible for managing requests to access health data for secondary use.

That means building the legal and governance framework, the technical infrastructure, and the connection to HealthData@EU, the EU's cross-border infrastructure for secondary use.

Five capabilities the HDAB needs

Each one is its own work package, and each one has to work before secondary use can go live.

DAAMs

Data Access Applications Management

Receiving, assessing, and approving requests from researchers and organisations to access health data.

nHDsC

National Health Dataset Catalogue

Where the health datasets available for secondary use are registered and can be discovered.

SPE

Secure Processing Environment

Where approved researchers actually analyse the data — it never leaves this controlled environment.

XBG

Cross-Border Gateway

The technical connection to HealthData@EU and the other Member States' systems.

DQET / DQUL

Data Quality Toolbox

Tools to assess, measure, and improve the quality and interoperability of datasets.

EHDS4CY: a complementary, citizen-facing project

Separate from CY-EHDS-2ND — starting now, with two specific services.

EHDS4CY is not the project building Cyprus's secondary-use infrastructure — CY-EHDS-2ND already is. EHDS4CY is a smaller, newer project starting now, adding two citizen-facing services on top of that infrastructure.

EHDS4CY

Building the foundational framework for two services: an opt-out mechanism for citizens, and a citizen-facing transparency portal describing how their health data is reused.

Two services, one foundation

The opt-out mechanism and the transparency portal share the same underlying needs — verifying citizen identity, recording consent choices, and keeping an auditable trail. EHDS4CY builds that shared foundation once, for both.

Secondary use: where the timeline actually stands

CY-EHDS-2ND is already past its first milestones.

NOW — SEP 2026

2027

2029

Pilots under way

Prototypes for all five HDAB capabilities delivered; pilots for DAAMs, the catalogue, the SPE, the gateway, and data quality are running now.

Operational HDAB services

CY-EHDS-2ND targets fully operational services; EHDS4CY's opt-out and transparency services join in parallel.

EU-wide mandatory obligations

Most of Chapter IV becomes applicable across the EU — Cyprus's HDAB will already be running.

One more thing: this all needs to be secure

The legal baseline for Cyprus — and why it has to become shared, coordinated action.

Health is classified as a high-criticality sector under Cyprus's NIS2 law (Law 89(I)/2020, as amended by 60(I)/2025). As NCPeH and secondary-use infrastructure expand, they fall squarely within that scope — including a notably strict national reporting clock: **6 hours** for early warning.

Why hospitals can't defend alone

Health data crosses many organisations — so does the risk.

The stakes are different here

A breach in healthcare isn't only a data-protection problem. It can disrupt patient care directly, and it touches some of the most sensitive personal data that exists.

As EHDS connects more systems — primary use, secondary use, cross-border exchange — the number of connected entry points keeps growing.

No single organisation sees it all

Hospitals, doctors, laboratories, pharmacies, diagnostic centres, and NeHA are all connected through the same health-data ecosystem. An incident at any one of them can affect the others.

That makes cybersecurity a shared responsibility, not something any single provider can own alone.

A reminder of the pattern: in February 2026, a French healthcare software supplier — not a hospital itself, but a platform connecting thousands of doctors — was breached. The risk in a connected health system includes every organisation attached to it, not only the largest ones.

What Cyprus needs next: coordinated cybersecurity for health

A proposal: a national coordination function for the health sector.



24/7 monitoring

Continuous detection of incidents across hospitals, providers, and eHealth infrastructure — not limited to business hours.



Coordinated incident response

Shared procedures so providers and NeHA meet the six-hour reporting clock together, not separately.



Sector-wide training

Building cybersecurity capacity across hospitals, providers, and their staff, on a recurring basis.



Shared threat intelligence

A common channel for providers to share indicators of compromise and lessons learned across the sector.

This isn't about replacing the Digital Security Authority — it's about giving the health sector a dedicated, coordinated layer within that structure.

Where EU cybersecurity funding for health is headed

The Digital Europe Programme is the main engine — and hospitals are now a named priority.

July 2026: the European Commission published its Action Plan on Cybersecurity and Artificial Intelligence — explicitly naming health among the critical sectors that will get a secure platform to test AI-driven cybersecurity solutions.

The funding channel

The Digital Europe Programme's Cybersecurity Work Programme (2025–2027), run by the European Cybersecurity Competence Centre (ECCC).

Already funded

January 2025's hospital action plan (€6M support centre) and the DEPLOY-CYBER-08-CYBERHEALTH call, which funded REINFORCE.

What's opening next (2026–2027)

National & Cross-Border Cyber Hubs; AI-based cybersecurity for NIS2 entities (~€96M, September 2026); an EU-wide Grand Challenge on AI for cybersecurity.

The direction is consistent: safe AI adoption, stronger cyber resilience, and scaled-up European AI capability for cybersecurity — with health named as one of the sectors to get there first.

The related projects already in motion

Cyprus isn't waiting for the next call — three funded projects are already building this.

CY-EHDS-2ND

Secondary use / HDAB infrastructure

EU4Health · 2023–2027

NeHA (coordinator) with the University of Cyprus

EHDS4CY

Citizen opt-out mechanism & transparency portal (secondary use)

Starting now

NeHA

REINFORCE

AI-driven cybersecurity for hospitals

Digital Europe Programme · €9M · 36 months

NeHA — piloting on the NCPeH testing environment that carries Cyprus's cross-border health services

Where Cyprus stands today

- **Primary use**

Live: ePrescription, eDispensation, Patient Summary. Original Clinical Documents by end of 2026 — ahead of the 2031 deadline.
- **Secondary use**

CY-EHDS-2ND building Cyprus's HDAB since 2023 — pilots under way now, operational services targeted for 2027. EHDS4CY adds opt-out and transparency services in parallel.
- **Security**

In scope as a high-criticality sector under NIS2 — a six-hour reporting clock that our infrastructure needs to be ready for.

Further information

Where to read more.

- **Regulation (EU) 2025/327**
Official Journal publication — EUR-Lex
- **EHDS Frequently Asked Questions**
European Commission
- **EUHPP webinar series**
Primary use, secondary use, and implementation — governance, in three parts
- **Primary (NCPdH) & Secondary Use**
National eHealth Authority of Cyprus

Thank you

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