



PROTECTION OF YOUR PERSONAL DATA

This privacy statement provides information about the processing and the protection of your personal data.

Processing operation: Monitoring, investigative, auditing and consultative activities of CEPOL DPO

Data Controller: The European Union Agency for Law Enforcement Training, Data Protection Officer

Record reference: DPR-CEPOL-2024-0052

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1. Introduction

The European Union Agency for Law Enforcement Training (hereafter 'CEPOL') is committed to protect your personal data and to respect your privacy. CEPOL collects and further processes personal data pursuant to [Regulation \(EU\) 2018/1725](#) of the European Parliament and of the Council of 23 October 2018 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data (repealing Regulation (EC) No 45/2001).

This privacy statement explains the reason for the processing of your personal data, the way we collect, handle and ensure protection of all personal data provided, how that information is used and what rights you have in relation to your personal data. It also specifies the contact details of the responsible Data Controller with whom you may exercise your rights, the Data Protection Officer and the European Data Protection Supervisor.

The information in relation to processing operation "*Monitoring, investigative, auditing and consultative activities of CEPOL DPO*", undertaken by the European Union Agency for Law Enforcement Training, Data Protection Officer (CEPOL DPO) is presented below.

2. Why and how do we process your personal data?

Purpose of the processing operation: According to Article 45 of Regulation (EU) 2018/1725, the EPOL DPO collects and further processes personal data where strictly necessary for the following monitoring, investigative, auditing and consultative activities:

- a) to inform and advise the controller or the processor and the employees who carry out processing of their obligations pursuant to this Regulation and to other Union data protection provisions;
- b) to ensure in an independent manner the internal application of this Regulation; to monitor compliance with this Regulation, with other applicable Union law containing data protection provisions and with the policies of the controller or processor in relation to the protection of personal data, including the assignment of responsibilities, the raising of awareness and training of staff involved in processing operations, and the related audits;
- c) to ensure that data subjects are informed of their rights and obligations pursuant to this Regulation;
- d) to provide advice where requested as regards the necessity for a notification or a communication of a personal data breach pursuant to Articles 34 and 35;
- e) to provide advice where requested as regards the data protection impact assessment and monitor its performance pursuant to Article 39 and to consult the European Data Protection Supervisor (EDPS) in case of doubt as to the need for a data protection impact assessment;
- f) to provide advice where requested as regards the need for prior consultation of the EDPS, or pursuant to Article 40 to consult the EDPS in case of doubt as to the need for a prior consultation;
- g) to respond to requests from the EDPS; within the sphere of his or her competence, to cooperate and consult with the EDPS at the latter's request or on his or her own initiative;
- h) to ensure that the rights and freedoms of data subjects are not adversely affected by processing operations.

Your personal data will not be used for an automated decision-making including profiling.

3. On what legal ground(s) do we process your personal data

We process your personal data, because, according to Article 5(1)(b) of Regulation (EU) 2018/17125, the processing is necessary for compliance with a legal obligation to which the controller is subject.

Legal basis:

- Regulation (EU) 2018/1725 - The tasks of any Data Protection Officer in an European Institution and body are laid down in Articles 44 and 45 of Regulation (EU) 2018/1725.
- CEPOL Management Board Decision implementing rules on DPO tasks and duties.

We do not process **special categories of personal data**, therefore Article 10 of the Regulation does not apply.

4. Which personal data do we collect and further process?

In order to carry out this processing operation, the CEPOL DPO collects the following categories of personal data:

- Any personal data of any individuals, whose personal data are processed by CEPOL or its processors, might potentially be the subject of monitoring, investigative, auditing or consultative activities of the DPO.

In particular:

- Name and function;
- Contact details (e-mail address, telephone number, postal address, company and department, country of residence, etc.);
- A copy of an identity document of applicants (where relevant);
- Case involvement data;
- Any other types of personal data specific to the processing operation that the DPO monitors, investigates, audits or is being consulted upon.

The DPO obtains personal data:

- directly from you, when you exercise your rights under Regulation (EU) 2018/1725, consult the DPO or request that she/he carry out monitoring, investigations or audits;
- from other natural and legal persons where they consult the DPO or request that she/he carry out monitoring, investigations or audits;
- from the EDPS in relation to the complaints transmitted or inspections launched by them.

The provision of personal data is mandatory to meet a legal obligation: Regulation (EU) 2018/1725. If you do not provide your personal data, we will not be able to fulfil our obligations.

5. How long do we keep your personal data?

The CEPOL DPO only keeps your personal data for the time necessary to fulfil the purpose of collection or further processing, namely for:

- Data categories related to monitoring the consultations on personal data protection: will be anonymised after 5 years of its creation.
- Data related to rights of data subjects: will be anonymised after 2 years from the final reply to the data subject.

- Data related to EDPS consultations: will be anonymised after 1 year from the closure of the consultation/ last communication form the EDPS.
- Data related to a DPO investigation: will be anonymised after 2 years from the closure of the investigation.
- Data related to consultations to the DPO: will be deleted or anonymised after 5 years.
- Data related to trainings/awareness of the DPO will be deleted in a maximum of 2 years of the concrete awareness activity.

6. How do we protect and safeguard your personal data?

All personal data in electronic format (e-mails, documents, databases, uploaded batches of data, etc.) are stored either on the servers of CEPOL or of its contractors.

CEPOL's contractors are bound by a specific contractual clause for any processing operations of your data on behalf of CEPOL, and by the confidentiality obligations deriving directly from the General Data Protection Regulation in the EU Member States (Regulation (EU) 2016/679) or, in case of the European Commission – DG DIGIT, Regulation (EU) 2018/1725. For the European Commission, the Decision (EU, Euratom) 2017/46 of 10 January 2017 on the security of communication and information systems in the European Commission apply.

In order to protect your personal data, CEPOL has put in place a number of technical and organisational measures in place. Technical measures include appropriate actions to address online security, risk of data loss, alteration of data or unauthorised access, taking into consideration the risk presented by the processing and the nature of the personal data being processed. Organisational measures include restricting access to the personal data solely to authorised persons with a legitimate need to know for the purposes of this processing operation.

7. Who has access to your personal data and to whom is it disclosed?

Access to your personal data is provided to CEPOL staff responsible for carrying out this processing operation and to authorised staff according to the “need to know” principle. Such staff abide by statutory, and when required, additional confidentiality agreements.

We do not foresee the publication of your personal data. We will not transfer your personal data.

Please note that pursuant to Article 3(13) of the Regulation, public authorities (e.g. Court of Auditors, EU Court of Justice) which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients. The processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing.

The information we collect will not be given to any third party, except to the extent and for the purpose we may be required to do so by law.

8. What are your rights and how can you exercise them?

You have specific rights as a ‘data subject’ under Chapter III (Articles 14-25) of Regulation (EU) 2018/1725, in particular the right to access, your personal data and to rectify them in case your personal data are inaccurate or incomplete. Where applicable, you have the right to erase your personal data, to restrict the processing of your personal data, to object to the processing, and the right to data portability.

You have the right to object to the processing of your personal data, which is lawfully carried out pursuant to Article 5(1)(a) on grounds relating to your particular situation.

You can exercise your rights by contacting the Data Controller, or in case of conflict the Data Protection Officer. If necessary, you can also address the European Data Protection Supervisor. Their contact information is given under Heading 9 below.

Where you wish to exercise your rights in the context of one or several specific processing operations, please provide their description (i.e. their Record reference(s) as specified under Heading 10 below) in your request.

9. Contact information

- The Data Controller

If you would like to exercise your rights under Regulation (EU) 2018/1725, or if you have comments, questions or concerns, or if you would like to submit a complaint regarding the collection and use of your personal data, please feel free to contact the Data Controller:

dpo@cepol.europa.eu

- The Data Protection Officer (DPO) of CEPOL

You may contact the Data Protection Officer (dpo@cepol.europa.eu) with regard to issues related to the processing of your personal data under Regulation (EU) 2018/1725.

- The European Data Protection Supervisor (EDPS)

You have the right to have recourse (i.e. you can lodge a complaint) to the European Data Protection Supervisor (edps@edps.europa.eu) if you consider that your rights under Regulation (EU) 2018/1725 have been infringed as a result of the processing of your personal data by the Data Controller.

10. Where to find more detailed information?

CEPOL Data Protection Officer (DPO) publishes the register of all processing operations on personal data by CEPOL, which have been documented and notified to them. You may access the register via the following link: <https://www.cepol.europa.eu/data-protection>

This specific processing operation has been included in the DPO's public register with the following Record reference: **DPR-CEPOL-2024-0052: Monitoring, investigative, auditing and consultative activities of CEPOL DPO.**