

Privacy Statement	Document number: FO.DAPR.046-1
	Approval date: 12/07/2021

Form



Privacy Statement for Covid-19 Certificate issued by Belgian Authorities

This privacy statement, in line with Articles 15 and 16 of [Regulation \(EU\) 2018/1725](#)¹, provides information to the data subjects relating to the processing of personal data of individuals carried out by the European Union Agency for Law Enforcement Training (CEPOL) in fulfilling its tasks.

The purpose of this document is to describe how CEPOL complies with its obligations to protect personal data under Regulation (EU) 2018/1725 and to provide individuals with information about CEPOL's processing of personal data and their rights under the Regulation.

What is the purpose of the processing?

To collect and transmit data to relevant Belgian authority of staff members and their family members residing in Belgium and who wish so, for the purpose of obtaining a 'digital key' (a user name and password) which allows access to all federal public sites, local sites, including the Ma Santé portal relevant in the context of Covid-19 certificates.

What is the legal basis for the processing of personal data?

- Regulation (EU) 2018/1725 and in particular Article 5 (d).
- Treaty on the European Union, in particular Article 4(3).
- The Protocol on the Privileges and Immunities of the European Union, in particular article 15.
- For access to the Digital Key for Belgian residents processing is based on Articles 11 and 15 of the Protocol (No 7) on the Privileges and Immunities of the European Union, European Commission Decision of 5 March 2021 on the transmission of personal data of Commission staff, pensioners and their family members to national health authorities in the context of COVID-19 vaccination and consent of the data subjects.

Who is the data controller?

The data controller is the Head of Corporate Services Department, Headofcsd@cepol.europa.eu.

Who are the data subjects?

CEPOL Staff members who is residing in Belgium.

Which types of data are being processed?

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

For the ordinary administration of officials and other servants:

- First and family name

¹ 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, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/EC, OJ L 295, 21.11.2018, p. 39–98.

Privacy Statement

Document number: FO.DAPR.046-1

Approval date: 12/07/2021



- Private home address
- Private home phone number
- Private mobile number, if any
- Service mobile phone, if any
- Private e-mail address, if any

In the framework of the Protocol of Privileges and Immunities, private details of officials and other servants and their family members:

- First and family name
- Civil status
- Date of birth
- Nationality
- Date of move to the workplace
- Full private home address

In the framework of access to the Digital Key for staff residing in Belgium:

- For Officials and other servants: Personal ID, Full Name, Date of birth, National registration number (NISS/BIS), and email address.
- For their family members (if any): Full Name, Date of birth, Relation with the staff member, National registration number (NISS/BIS), and email address.

How is data processed?

All personal data in electronic format (e-mails, documents, databases, uploaded batches of data, etc.) are stored either on the servers of the European Commission. All processing operations are carried out pursuant to the [Commission Decision \(EU, Euratom\) 2017/46](#) of 10 January 2017 on the security of communication and information systems in the European Commission.

In order to safeguard and protect your personal data, CEPOL has put in place a number of technical and organisational measures. 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. If and when necessary, transfer of such data is always done strictly via encrypted email or by normal e-mail with ZIP file protected by password.

Who are the recipients of the data being processed?

- CEPOL HR Team;
- Commission services in relation to this specific field of competences;
- Permanent Representations of the EU member states;
- Recipients in the framework of the access to the Digital Key for Belgian residents is the Belgian authority - the DG Digital Transformation of the Federal Public Service Strategy and Support.

Is data transferred to third countries or international organisations?

Not applicable.

What rights do data subjects have?

Data subjects have the right to access their personal data and the right to request from the controller rectification or erasure of personal data. Data subjects have the right to request restriction of processing of personal data concerning them or to object to the processing of their data.

Data subjects can refuse and/or withdraw their consent with respect to further processing of their data. In addition, data subjects have the right to receive their personal data in a structured, commonly used and machine-readable format.

Substantiated requests should be emailed to Headofcsd@cepol.europa.eu. The time limit to block/erase data on justified grounds at the request of data subjects is 15 working days from the date of receipt of such a request.

General requests can be emailed to the CEPOL Data Protection Officer at DPO@cepol.europa.eu

How long is your data retained by CEPOL?

CEPOL only keeps your personal data for the time necessary to fulfil the purpose of collection or further processing, namely until 8 years after the extinction of all the rights.

Who should you contact for more information on the processing of your personal data by the Agency?

Data Protection Officer (DPO)

Within CEPOL, there is a data protection officer. This person is independently responsible for ensuring the internal application of Regulation (EU) 2018/1725 and that the rights and freedoms of the data subjects are not likely to be adversely affected by the processing operations. The DPO keeps a register of all processing operations of personal data carried out by the Agency.

The DPO also provides advice and makes recommendations on rights and obligations of data controllers and data subjects. CEPOL's DPO can be contacted at dpo@cepol.europa.eu.

European Data Protection Supervisor (EDPS)

The [European Data Protection Supervisor](#) is an independent supervisory authority with responsibility for monitoring and ensuring the application of data protection rules by EU Institutions and Bodies, which includes CEPOL. The EDPS provides advice to EU Institutions and Bodies on all matters relating to the processing of personal information and cooperates with national supervisory authorities to improve protection of personal information.

What should you do if you believe your data is being misused by the Agency?

If you believe your data is being misused by CEPOL, or is otherwise not compliant with your rights and freedoms under Regulation (EU) 2018/1725, you should notify the Head of Corporate Services Department, Headofcsd@cepol.europa.eu. You may also contact the Agency's DPO to inform him/her of any issues related to the processing of your data. If the problem is not rectified after contact with the data controller and DPO, every data subject has the right of recourse to lodge a complaint with the EDPS, as provided for by Article 63 of Regulation (EU) 2018/1725.