



## Privacy Statement for processing personal data in CEPOL Onsite/Online Training Activities

This privacy statement, in line with Articles 15 and 16 of [Regulation \(EU\) 2018/1725](#)<sup>1</sup>, 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?

The purpose of processing is to enable the preparation, implementation and evaluation of Onsite/Online Training Activities (i.e. Courses, Seminars or Conferences) organised by CEPOL staff.

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

Regulation (EU) 2015/2219 of the European Parliament and of the Council of 25 November 2015 on the European Union Agency for Law Enforcement Training (CEPOL) and in particular Article 4(2)(a)(c) thereof.

Regulation (EU) 2018/1725 and in particular Article 5(1)(a) and (d) thereof.

### Who is the data controller?

The data controller is the Head of the Training and Research Unit (TRU), [Headoftru@cepol.europa.eu](mailto:Headoftru@cepol.europa.eu)

### Who are the data subjects?

- Participants, as defined in the IGN<sup>2</sup> 1.3, and Subject Matter Experts/Trainers, as defined in the IGN 1.4, attending CEPOL Onsite/Online Training Activities.
- Line managers of the participants to assess the impact of the training on participants' performance in the context of CEPOL's post-course evaluation.,

### Which types of data are being processed?

A) In the context of preparation of the Onsite/Online Training Activity, for the purposes of nomination of participants, the data are collected via a form with the following fields:

- **For the nominating entity:** contact details (name, phone, country, e-mail address);
- **for the nominated participant:** Organisation, first name and family name, type of law enforcement (police, customs, board/maritime/coast guard, judiciary/prosecutors or other), email address, office phone, mobile phone, title of the job, cost coverage.

<sup>1</sup> 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.

<sup>2</sup> Integrated Guidance Note (IGN) for CEPOL Onsite Training Activities available on LEEed e-learning platform

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- B) In the context of organisation of logistics for onsite activities, the data are collected via a registration and travel request form with the following fields:
- For participants: first and last name, passport information (Number, issuing country, validity period) or ID number, date of birth gender (Ms/Mrs/Mr), nationality, office phone, mobile phone, email, organisation and postal and e-mail address for the sending of tickets, dietary and/or special requirements.
  - For Supervisors/Line Managers: title/rank/function, name and email address.
- C) In the context of the Evaluation and Post-course Evaluation, the email addresses of both participants as well as Supervisor/Line Manager's will be used both for online as well as onsite training activities.
- D) For Certification of Participation, the first and last names of participants will be used, both for onsite and online activities. Grades and lists of enrolled/completed training activities may be stored under the personal profile of the user on the LEEd Platform.
- E) In case of trainers receiving fees, further data are collected via the BAF (bank account number, IBAN number).

### How are data processed?

Data are processed mainly manually. The Training and Research Unit (TRU) receives from the CEPOL National Units (CNUs), the National Contact Points (NCP) and the Organisational Contact Points (OCP) a list with nominated participants from their countries/organisations. After selection of the participants, the CNUs, NCPs and OCPs are informed by CEPOL about the number of nominated and selected participants from the different countries and nationalities; here only initials of the first and last name of confirmed participants are included for recognition by their CNUs/NCPs/OCPs only.

For the selection of subject matter experts/trainers<sup>3</sup>, CEPOL receives the data directly via the Trainer Registration and Travel Request form and the Trainer Professional Background form which each subject matter expert/trainer has to complete.

For Onsite activities, all participants and subject matter experts/trainers complete a Registration and Travel Request form to allow for organisation of travel and accommodation arrangements.

For the processing of personal data related to the user and account management on the LEEd Platform, please refer to the Privacy Statement on LEEd<sup>4</sup>

Physical files are kept in locked cupboards.

### Who are the recipients of the data being processed?

- Relevant CEPOL staff members (staff of the Training and Research Unit dealing with the organisation of Onsite/Online Training Activities; staff of the Travel Team, staff of the Finance Team).
- Relevant CNUs, Framework Partners, NCPs, OCPs (only in relation to the selected participant in case the nominations are more than one. Grades may be shared on a need-to-know basis), participants and subject matter experts/trainers for the activity in

<sup>3</sup> More information on this processing to be included in the dedicated Privacy Statement on Experts

<sup>4</sup> Available here : <https://www.cepola.europa.eu/data-protection>

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which they participate ( only in relation to country and sending organisation, type of law enforcement, first name and family name, email, mobile and office phone).

- EU institutions, agencies and bodies co-organising training activities with CEPOL (only for the personal data contained in the participants list).
- General public via the CEPOL publications or website (only for photos and/or interviews taken during the onsite/online training activity<sup>5</sup>).
- CEPOL Internal Audit Panel and/or the Internal Control Officer (if relevant).
- EU bodies (upon request): European Court of Justice, European Ombudsman, European Data Protection Supervisor, European Anti-Fraud Office (OLAF), Internal Audit Service of the European Commission, European Court of Auditors,

For the organisation of onsite training activities:

- External contractor<sup>6</sup> booking travel services for CEPOL (only in relation to data contained in the travel request form).
- Receptionists and security guards at CEPOL (only in relation to the names, nationality and departure time of the participants and subject matter experts/trainers) as well as the receptionists and security guards of the International Training Centre ('ITC') of the Ministry of Interior of Hungary (only for training activities of the CEPOL Cybercrime Academy or any other training activities organised by CEPOL that take place in the premises of the ITC and only in relation to names, nationality and departure time of the participants and subject matter experts/trainers). In the context of a pandemic and in case of an infection during a training activity where physical presence is required, CEPOL may need to share personal data with national health authorities.

### Are data transferred to third countries or international organisations?

No.

### 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. In this regard, the data subject shall complete a specific form provided at the beginning of the training activity.

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 [Headoftru@cepol.europa.eu](mailto:Headoftru@cepol.europa.eu). The time limit to block/erase data on justified grounds at the request of data subjects is fifteen (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](mailto:DPO@cepol.europa.eu)

<sup>5</sup> More details on this processing are to be found in the dedicated Privacy Statement for the processing of photographs, audio and video recordings.

<sup>6</sup> Subject to Regulation (EU) 2016/679, the so-called General Data Protection Regulation (GDPR).

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### How long are your data retained by CEPOL?

The general retention period for personal data regarding CEPOL onsite/online training activities is set to three (3) years from implementation of the activity. A data deletion exercise takes place annually both for electronic and paper files for the deletion of files containing personal data or for cleaning those files from personal data concerning courses implemented in year N-3. It is possible that certain files with historical value are retained beyond the period of three (3) years. This concerns in particular course materials and signature lists for participants/subject matter experts/trainers (names of participants are deleted but names of subject matter experts/trainers are kept).

Personal data stored on the LEEd Platform and pertaining to the user profiles shall follow the retention period set in the Privacy statement on LEEd<sup>7</sup>

### 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](mailto:dpo@cepol.europa.eu).

#### European Data Protection Officer (EDPS)

The [European Data Protection Officer](#) 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 the Training and Research Unit, contact: [Headoftru@cepol.europa.eu](mailto:Headoftru@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.

<sup>7</sup> Available here : <https://www.cepol.europa.eu/data-protection>