

Privacy Statement	Document number: FO.DAPR.010-3
	Approval date: 05/09/2019

Form



Privacy Statement for Processing Grant Applications

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 evaluate the grant applications and to monitor the implementation of the grants to organise CEPOL residential activities by CEPOL Framework Partners.

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 replacing and repealing Council Decision 2005/681/JHA² (hereinafter the 'CEPOL Regulation').

TITLE VIII GRANTS of Regulation (EU, Euratom) No 2018/1046 of the European Parliament and of the Council of 18 July 2018 on the financial rules applicable to the general budget of the Union, amending Regulations (EU) No 1296/2013, (EU) No 1301/2013, (EU) No 1303/2013, (EU) No 1304/2013, (EU) No 1309/2013, (EU) No 1316/2013, (EU) No 223/2014, (EU) No 283/2014, and Decision No 541/2014/EU and repealing Regulation (EU, Euratom) No 966/2012³.

Governing Board Decision 25/2011/GB enacting the mandate of the Director to establish and implement the grant application procedure and to conclude CEPOL Framework partnership and grant agreements and repealing Governing Board Decision 26/2010/GB.

Management Board Decision 13/2019/MB on the CEPOL Financial Regulation and Repealing Decision 01/2014/GB, and in particular Article 91.

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

Who is the data controller?

The data controller is the Head of Training Unit: headoftru@cepol.europa.eu

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.

² OJ L 319, 4.12.2015, p.1.

³ OJ L 193, 30.07.2018, p.1

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Who are the data subjects?

- Representatives of the CEPOL Framework Partners involved in the preparation and implementation of grant applications and agreements
- Evaluation Committee members
- Opening Committee members

Which types of data are being processed?

Framework Partner Applicants

- Organisation name in English and the original language
- Legal Representative of the organisation:
 - Title
 - First name and surname
 - Position in the applicant organisation
 - Signature
- Organisation's address or registered office
- Framework Partnership Agreement number
- Contact details of the person who should be contacted in case of any questions regarding the application:
 - First name and family name
 - Office phone number
 - Mobile phone number
 - Email address
- Bank account details of the organisation
 - Name of the bank account holder
 - Name of the bank
 - Address of the bank
 - IBAN
- Identity of co-applicants (in case of a consortium)
 - Organisation name in English
 - Framework Partnership Agreement Number
 - Information regarding the legal representative of the co-applicant is contained in the Framework Partnership Agreement
 - Title
 - First name and surname
 - Position in the applicant organisation
 - Signature

Opening Committee

- First name and surname
- Job title

Grants Evaluation Committee

- First name and surname
- Job title

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How is data processed?

Framework Partners of CEPOL apply for grants to carry out CEPOL activities listed in the CEPOL Training Catalogue by filling out the forms annexed to the call, which includes the following elements:

- Application form per activity/set of activities duly completed, dated and signed by the person authorised to enter into legally binding commitments on behalf of the applicant
- (If applying in consortium) originals or their copies of partnership forms for each consortium member
- Declaration of honour form regarding the exclusion and selection criteria
- Financial proposal (in a separate envelope)

Grant applications are delivered by post or in hand to CEPOL.

The assessment of the eligibility of the submitted applications is performed by an independent Opening Committee whereas the evaluation is carried out by an evaluation committee assisted by a member of CEPOL Staff.

CEPOL staff members involved in the grant management process mainly process data manually. The paper files are kept in locked cupboards.

Who are the recipients of the data being processed?

- CEPOL staff involved in the grant management process e.g members of the Opening Committee) ;
- Executive Director of CEPOL;
- Members of the Grants Evaluation Committee (CEPOL, European Commission, Europol);
- EU bodies: European Court of Justice, European Ombudsman, European Data Protection Supervisor, Internal Audit Service of the European Commission, European Court of Auditors, OLAF (upon request).

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 the Head of Training Unit, headoftru@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

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How long is your data retained by CEPOL?

Data relating to the grant procedure is retained by CEPOL for three years. The data deletion exercise is undertaken annually whereby files concerning the grants applications from year N-3, are deleted or cleaned of personal data. The residential activities team is responsible for this and the deadline of completion of the exercise is by 15 February each year.

Emails containing personal email addresses and personal data shall also be deleted.

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 data controller, Head of Training Unit, 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.