



## Privacy Statement for Legal Entity Form ('LEF') and Bank Account Form ('BAF')

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 collecting and using personal information in the Legal Entity Form is two-fold. Firstly, it is used to validate the legal existence of individuals or organizations, ensuring that they are legitimate entities within the system. This helps to prevent fraudulent activities and unauthorized access to CEPOL's services. Secondly, the information gathered through the LEF is necessary for all financial and contractual transactions undertaken by CEPOL. It allows for the identification and verification of legal entity records, which are essential in conducting business operations effectively and compliantly.

The purpose of collecting and using personal information in the Bank Account Form is to facilitate the secure execution of payments. CEPOL may require bank account details to accurately transfer funds and ensure that payments are made to the correct recipient. This information helps to streamline financial transactions and maintain the necessary records for auditing and accountability purposes.

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

Regulation (EU) 2018/1725, in particular Article 5, paragraph 1 (b), (c);

Regulation (EU, Euratom) No 2018/1046<sup>2</sup> 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 966/2012, in particular Article 86;

<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> OJ L 193, 30.07.2018, p.1

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Management Board Decision 13/2019/MB of 21 May 2019 adopting the CEPOL Financial Regulation<sup>3</sup>, in particular Article 51.

### Who is the data controller?

The data controller is the Head of Corporate Services, [HeadofCSD@cepol.europa.eu](mailto:HeadofCSD@cepol.europa.eu)

### Who are the data subjects?

Data subjects are any natural or legal entity that fills in the Legal entity form and the bank account form.

### Which types of data are being processed?

All the personal data contained in the legal Entity form and Bank Account form, as well as supporting documents you have provided

- **Natural person:**
  - Personal data : family name(s), first name(s), date of birth, place and country of birth, type of identity document, issuing country, identity document number, personal identification number, complete permanent private address, private phone number and email address, signature.
  - Business data (if applicable): business name, VAT number, registration number, place of registration, city and country.
- **Private law body:**
  - Official name, business name (if applicable), abbreviation, legal form, organisation type, main registration number, secondary registration number (if applicable), place of main registration ( City, Country), date of main registration, VAT number, complete address of Head Office, country, phone number, email address, stamp, signature of authorised representative.
- **Legal Entity Form for Public Law Body:**
  - Official name, abbreviation, main registration number, secondary registration number (if applicable), place of main registration (city, country), date of main registration, VAT number, complete official address, country, phone number, email address, stamp, signature of authorised representative.
- **Financial Identification Form:**
  - Banking details: account name, IBAN/Account number, currency, BIC/SWIFT code, branch code (if applicable).
  - Bank information: Name, complete address of the branch, stamp, signature of the bank representative.
  - Account's holder information: Name, complete address, signature.

### How is data processed?

Data subject communicates his/her personal information to CEPOL's contact person via the legal entity form ('LEF') and the bank account form ('BAF'). CEPOL's contact person forwards then the said forms to Finance Team. Finance Team encodes the provided information in the Accrual-based Accounting system ('ABAC system').

<sup>3</sup> Available here : [https://www.cepol.europa.eu/sites/default/files/Decision\\_13-2019-MB.pdf](https://www.cepol.europa.eu/sites/default/files/Decision_13-2019-MB.pdf)

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All data related to staff members are both stored in a paper version in the personal file of the Staff member and electronically in the ABAC System.

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

- CEPOL staff dealing with financial and accounting matters
- CEPOL staff members acting as contact person (e.g. HR Team, Procurement Team)
- Internal Audit Service of the European Commission, European Court of Auditors, OLAF and any other institution or body competent in the fields of auditing or investigation (upon request)
- personal data may be transferred to banking institutions to execute payments as defined in the legal document for the payment.

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

In case you are requesting a payment in a bank account, which is not located in EEA, your personal data will be transferred to banking institutions in a third country in accordance with Regulation (EU) 2018/1725. In particular, the transfer would be based on adequacy decision (Art. 47) in absence of which on appropriate safeguards (Art. 48) or based on derogations (Art. 50. 1(b) and 50. 1(c)).

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

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

Personal data shall be kept as long as necessary to fulfil the purpose of collection or further processing, namely:

- A maximum of 10 years after the last transaction related to natural person.
- A maximum of 120 years after the date of recruitment for Staff (to satisfy any request that may arise after the end of a staff member's contract or after their retirement)

### 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

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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 data controller, the Head of Corporate services, [HeadofCSD@cepol.europa.eu](mailto: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.