

Privacy Statement	Document number: FO. DAPR.038-2
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Privacy Statement for Processing Personal Data related to the CEPOL e-newsletters, news alerts and email notifications

The EU Agency for Law Enforcement Training (CEPOL) is committed to protecting your personal data and to respecting your privacy.

This privacy statement, in line with Articles 15 and 16 of [Regulation \(EU\) 2018/1725¹](#), provides information to the data subjects relating to the processing of individuals' personal data carried out by 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 in relation to the processing operation "Management of subscriptions to receive information through electronic newsletters, news alerts and email notifications", undertaken by CEPOL.

What is the purpose of the processing?

Personal data are collected for the purposes of subscription to, and management of, mailing lists to facilitate the delivery of information to data subjects through electronic newsletters, news alerts and email notifications, focusing on announcements, developments, activities and initiatives under the scope of CEPOL's work.

In addition, personal data may appear in the articles, reports, interviews, as well as the visual content of the electronic newsletters, news alerts and email notifications. The preparation, development and dissemination of CEPOL newsletters, news alerts and email notifications is done through electronic means.

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

Regulation (EU) 2015/2219² 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/JHA.

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

Who is the data controller?

The data controller is the Head of Strategic Planning and Directorate Unit HoSPDU@cepol.europa.eu

Who are the data subjects?

- Any natural person who has expressed interest in, and has provided consent to, receiving electronic newsletters, news alerts and email notifications of CEPOL.

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.

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- Any natural person who has provided his/her consent to appear in the visual content of the e-newsletters/news alerts or has provided an interview to be published there.
- CEPOL staff members (including SNEs, interim workers and trainees), only for internal newsletters.

Which types of data are being processed?

In order to carry out the processing operation, the Data Controller collects from data subjects the following categories of personal data:

- e-mail address;
- frequency of notifications;
- topics of interest.

These personal data are needed to ensure the delivery of the service to data subjects as subscribers.

CEPOL collects this information to observe where the interest of readers lay and to improve the quality of the content provided through e-newsletters, news alerts and email notifications.

The **creation of the content** may also entail the use of photos or videos as well as of opinions expressed in interviews.

How is data processed?

Subscriptions to CEPOL e-newsletters, news alerts and email notifications are collected and processed through:

- A subscription form provided through CEPOL's public website, where the data subjects are informed and give explicit consent to be on CEPOL's distribution and mailing lists. The [subscription form](#) is hosted in the Newsroom environment³, where also the list of subscribers is stored and managed.

The management of the subscriptions, the compilation of the content and the dispatch of the CEPOL e-newsletters, news alerts and email notifications is based on the use of a third-party platform, Newsroom, that acts as service provider and has the role of data processor. The platform has in place features that comply with data protection requirements stemming from Regulation (EU) 2016/679 (the so-called 'GDPR').

Who are the recipients of the data being processed?

Access to personal data is provided to CEPOL staff, as well as to other authorised Commission staff according to the "need to know" principle. Such staff abide by statutory, and when required, additional confidentiality agreements.

Third parties acting as service providers for CEPOL may be granted access to personal data according to the "need to know" principle. Such staff abide by additional confidentiality agreements.

Pursuant to Article 3(13) of Regulation (EU) 2018/1725 public authorities (e.g. Court of Auditors, EU Court of Justice) which may receive personal data in the framework of a particular

³ Newsroom is a news management system developed by European Commission and used by European Commission and other institutions.

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inquiry in accordance with Union or Member State law shall not be regarded as recipients. The further 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.

Is data transferred to third countries or international organisations?

CEPOL does not transfer personal data to third countries or international organisations. The servers hosting the platform used for the compilation and dispatch of the e-newsletters, news alerts and email notifications are located within the European Union.

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. A request for erasure should be addressed to the data controller who will then delete any stored 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. The latter is facilitated via a dedicated 'Unsubscribe' button easily accessible and clearly visible in the end of the e-newsletter/news alert. Upon un-subscription the data subject will stop receiving the e-newsletters/news alerts.

Substantiated requests should be emailed to HoSPDU@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, with the additional caveat of the time that will be needed from the side of Newsroom for erasure.

How long is your data retained by CEPOL?

The email addresses on the list will be kept as long as the newsletter is issued. Specific emails will be removed upon receiving an automated message stating that the email address is not functioning any longer, or if the person asks to have his or her data removed from or changed in the database. Using the unsubscribe option offered in each newsletter issued will also ensure personal data are removed from CEPOL's distribution or mailing lists.

Data related to subscription management and dispatch are stored as long as data subjects continue receiving the e-newsletters, news alerts and email notifications.

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.

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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 HoSPDU@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.