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Privacy Statement for the Processing of Data in the Implementation of Micro-Credential Accredited Train-the-Trainer Courses implemented in the framework of the International Cooperation Projects

This document, 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?

The purpose of processing is to enable the implementation of CEPOL's activities, namely the implementation of micro-credential accredited Train-the-Trainer Courses implemented in the framework of the International Cooperation Projects, namely:

1. CT INFLOW - Enhancing Information Exchange and Criminal Justice Responses to Terrorism in the Middle East and North Africa
2. TOPCOP – Training And Operational Partnership Against Organised Crime Project
3. EUROMED Police
4. WB PaCT - Partnership against Crime and Terrorism
5. EU4Security Moldova

Processing is necessary for the preparation, implementation, monitoring and follow-up actions to be organized under the framework of CEPOL's mandate and in order to ensure the successful delivery of training activities from a logistical and substantial perspective, including travel arrangements, security considerations, adequacy of participation or engagement and monitoring of participation.

Specifically, processing of personal data will facilitate the administration, enrolment, and certification of participants in the micro-credential accredited Train-the-trainer Courses implemented in the framework of the international cooperation projects. This includes verifying identities, managing course registration, tracking progress, issuing certificates, communicating with participants, verifying assessment outcomes, and ensuring compliance with legal and university requirements. Additionally, personal data may be used for statistical analysis, reporting, and improving the quality of the activities.

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.

Personal data is necessary for the performance of a task carried out by CEPOL as foreseen in Article 4, (2) and (4) of the Regulation (EU) 2015/2219 of the European Parliament and 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. It will serve to identify experts in the relevant areas, contact points and means of communication in order to fulfil the general objectives of CEPOL's mandate and the relevant projects as described below.

1. CT INFLOW

- Contribute to preventing and disrupting terrorist networks and the activities of recruiters to terrorism;
- Reinforce the institutional capacity of partner countries in matters of information exchange enabling the swift exchange of terrorism-related information while maintaining a high standard of data protection;
- Provide criminal justice systems with the tools to improve regional and international cooperation in the fight against terrorism.

2. EUROMED Police

- Enhance cooperation within partner countries and between partner countries and the EU;
- Enhance capacity to produce structured training needs analysis;
- Enhance evidence-based identification of priority areas in the Southern Neighbourhood areas.

3. TOPCOP

- Strengthen strategic and operational cooperation between law enforcement authorities in the EaP countries, EU MS and EU Agencies;
- Build the capacity of relevant law enforcement services of partner countries to fight against serious and organised international crime.

4. WB PaCT

- Enhance knowledge of WB authorities of concrete law enforcement performance gaps that limit cooperation within the region and with the EU;
- Improve capability and response by WB authorities to performance gaps;
- Strengthen cooperation between Western Balkans and CEPOL.

5. EU4Security Moldova

- Enhance state and societal resilience and socio – economic recovery with particular focus on stability and peace;
- Improve human capital and operational capacities of the Ministry of Internal Affairs of Moldova for the delivery of professional security/ migration service.

Who is the data controller?

The data controller for CEPOL is the Head of the International Cooperation Unit, HeadofICU@cepol.europa.eu.

In addition, the Ludovika University of Public Service represented by Rector Dr Gergely Deli, nke@uni-nke.hu acts as data controller for student enrolment at the University.

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

Regulation (EU) 2015/2219 and in particular Article 4, paras (2) and (4);

Regulation (EU) 2018/1725 and in particular Article 5, para 1, (a) (b) (d);

The EU funded project Enhancing Information Exchange and Criminal Justice Responses to Terrorism in the Middle East and North Africa (CEPOL CT INFLOW II) regulated by Contribution Agreement No. 700001972 and its annexes;

The EU funded project EUROMED Police (CEPOL EUROMED VI Police) regulated by Contribution Agreement No. 700002160 and its annexes;

The EU funded project Training And Operational Partnership Against Organised Crime Project (CEPOL TOPCOP II) regulated by Contribution Agreement No. 700001970 and its annexes;

The EU funded project Partnership against Crime and Terrorism (CEPOL WB PaCT II) regulated by Contribution Agreement No. 7000018630 and its annexes;

The EU funded project EU4Security Moldova, regulated by Contribution Agreement NDICI-GEO-NEAR/2023/445-801 and its annexes;

The Framework Service Contract - CEPOL/FWC/2025/021 as well as its annexes, including the Agreement on Implementation of Micro-Credential Accredited TTT Courses, signed between CEPOL and the Ludovika University of Public Service.

Who are the data subjects?

The data subjects in the context of the of Micro-Credential Accredited Train-the-Trainer Courses implemented in the framework of the International Cooperation Projects are:

- The applicants and students/participants of each activity organised in the frame of the Micro-Credential Accredited Train-the-Trainers Courses,
- Supervisors of the students/participants as reporting line of the student/participant in line with the statement of good conduct,
- Trainers (be it short-term experts engaged via call for expression of interest² or any other means) and CEPOL staff (acting as moderators or chairpersons) for the respective activity,
- Representatives and staff of the Ludovika University of Public Service in particular when their data is shared with participants and trainers for the facilitation of logistical procedures and the coordination of activities.
- Other contact points or counterparties (co-organisers/ national contact points) in particular when their data is shared with participants and trainers for the facilitation of logistical procedures and the coordination of project activities.

² More information on privacy statement for the Call for Expression of Interest for Individual External Experts is available here <https://www.cepol.europa.eu/data-protection>

Which types of data are being processed?

<p>Identification Data</p>	<ul style="list-style-type: none"> • First name • Last/family name • Gender • Date of birth • Citizenship • Country and City of birth • Identity card/ Passport copy
<p>Professional data</p>	<ul style="list-style-type: none"> • Title/rank/function • Department/unit • Organization • Qualifications and professional experience • Curriculum Vitae (EUROPASS CV or similar) • Learning path, grades and exams taken during the course • Records of course completion and obtention of micro credentials
<p>User Generated Data</p>	<ul style="list-style-type: none"> • Online meeting and call recordings • Transcriptions of recordings of meetings • Uploaded files during online meetings
<p>Travel information</p>	<ul style="list-style-type: none"> • Visa application in the context of planned activities • Date and time of departure/arrival • Airport of departure/arrival and flight number • Accommodation details
<p>Others</p>	<ul style="list-style-type: none"> • Email address • Office/ mobile phone • Permanent Residence/ Address of Notification • Certificate/ Statement of Good Conduct signed by the participant's Supervisor • Signature • Dietary and/or special requirements

How is the data processed?

The processing is mainly manual. CEPOL receives the applications in electronic format via the respective points of contact. Applications are stored on the CEPOL secure network. After CEPOL has concluded the selection of candidates the respective points of contact are informed about the selected participants/ students.

CEPOL facilitates the student application processing of selected participants and submits the relevant information to the Ludovika University of Public Service (LUPS). The information required includes student application forms, the signed student oath, the student contract and the signed statement of good conduct. The LUPS will register and enrol the student in the NEPTUN Electronic Administration System. The online platform is used for registration, communication, e-learning and administrative management of students and courses.

During the course, LUPS and CEPOL will monitor and assess the progress of the student/ participant, particularly regarding the learning path, grades and exams taken during the course. Students/ Participants who have successfully fulfilled the specified criteria for each course will be awarded a certificate by LUPS and CEPOL. Records of credentials issued will be stored by CEPOL and the LUPS.

For the selection of subject matter experts/trainers, CEPOL receives the data directly from the subject matter expert/trainer. CEPOL will share expert details with LUPS for administrative purposes and logistical purposes, as well as to facilitate the evaluation of course results. For this the LUPS will register the expert in the NEPTUN Electronic Administration System.

All participants/ students and subject matter experts/trainers complete a travel request form to allow for organisation of travel arrangements.

Physical files are kept in locked cupboards. Personal data are also saved in the CEPOL internal drive with limited access to CEPOL staff. Personal data may also be processed using different ICT applications. This processing is defined in the relevant privacy statement.

The data processing takes place during and only for the purposes of successful delivery of each respective activity/set of activities, including:

- short-listing of participants/students (the processing of data serves the informed decision of the responsible decision-makers regarding the effective participation in a certain activity);
- logistical and administrative matters (such as preparation of enrolment documents, list of participants, meeting badges, meeting minutes, exams, assignments and certificates, and arrangements for accommodation and travel);
- monitoring purposes (engagement and completion of exams/assignments, as well as participation in courses funded by the same source);
- security purposes.

Additionally, the following data processing might take place:

- Residential activities

The contact data of selected students/ participants and contact points (name, email address and phone number) involved in residential activities might be shared with other subjects involved in the same activity in order to enable networking activities and cooperation. The data

might also be shared with guest speakers, CEPOL external experts/ trainers, CEPOL and LUPS staff members and European Union bodies and International Organisations involved in the specific activities, in order to ensure the logistical and administrative preparation, implementation, monitoring and follow-up of a residential activity. For photos, videos and dissemination of personal data to other participants the legal basis for processing is prior consent by the students/participants and trainers.

- Online activities

User generated data, as well as contact data might be used by CEPOL and LUPS for administrative purposes, namely the recording and documentation of online activities, as well as for monitoring purposes. This data is accessible by CEPOL and LUPS staff members and experts/trainers and may be accessible to the online platform in which the activity takes place and other participants in the same activity (if applicable).

Regarding the processing of personal data for activities to be organized in the LEEEd Platform, please consult “Privacy Statement for processing personal data on LEEEd (including the LEEEd mobile application)” available at: <https://www.cepola.europa.eu/data-protection>.

Who are the recipients of the data being processed?

- Dedicated CEPOL and LUPS staff members, including staff handling administrative matters and travel arrangements. Additionally, CEPOL and LUPS staff or experts handling data for monitoring, evaluation, and reporting purposes.
- External contractors booking logistical, travel and accommodation services for CEPOL (in relation to the type of data contained in the Travel Request form and/ or Activity Plan),
- Participants of events that have provided consent to share personal data with other participants.
- Other EU institutions, agencies and bodies, or international organisations and projects that are involved in the projects.
- 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,

Third countries or International organizations

Project activities in the context of International Cooperation may take place outside the EU/EEA. As a result, transfer of data to the respective counterparties of CEPOL might take place.

In such cases, Chapter V of Regulation (EU) 2018/1725 in relation of personal data to third countries or international organisations applies. In particular, in absence of adequacy decision, CEPOL controls whether any of the appropriate safeguards listed in Article 48 of Regulation (EU) 2018/1725 are in place. In absence of appropriate safeguards, CEPOL request the explicit consent of the data subjects concerned, in line with Article 50(1)(a) of Regulation (EU) 2018/1725.

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, and in case the processing is carried out by automated means, data subjects have the right to receive their personal data in a structured, commonly used and machine-readable format.

Data processing may be carried out during and only for the purposes of ensuring the successful delivery of each respective activity/set of activities and on the basis of consent of the data subjects. Data will be transferred to counterparties in third countries on the basis of consent of the data subjects. There will be no automated decision making or profiling upon their data.

Data subjects can request the exercise their rights to the Data Controller or DPO.

Substantiated requests should be emailed to HeadofICU@cepol.europa.eu or nke@uni-nke.hu. 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. The data Controller shall notify the data subject once the blocking/erasing of the data has been completed.

General requests can be emailed to the CEPOL Data Protection Officer at dpo@cepol.europa.eu or the LUPS Data Protection Officer at adatvedelem@uni-nek.hu. Data subjects have the right to lodge a complaint to the EDPS.

How long is your data retained by CEPOL?

Personal data is stored for a maximum of 5years after the conclusion of the relevant project. At the end of the retention period, records containing personal data may be kept permanently for archiving and/or historical research purposes if such action is specifically stated in CEPOL's document management policy or required to fulfil a legal obligation.

The identification data of the Single Points of Contact remains for the whole period someone acts as in that capacity. Records referring to financial information as well as supporting documents pertaining to payments will be kept for a maximum of 5 years in line with the Financial Regulation.

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, in this case the Head of International Cooperation Unit, via HeadofICU@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 to lodge a complaint with the EDPS, as provided for by Article 63 of Regulation (EU) 2018/1725.