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Privacy Statement for the Processing of Data in the Project Activities of the International Cooperation Unit

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, including activities under the following projects:

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 the activities from a logistical and substantial perspective, including travel arrangements, security considerations, adequacy of participation or engagement and monitoring of participation.

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 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.

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 is the Head of the International Cooperation Unit, HeadofICU@cepol.europa.eu.

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.

Who are the data subjects?

The data subjects in the context of projects activities for the International Cooperation Unit are:

- Nominated representatives acting as contact points in the relevant activities,
- The participants of each activity (courses, meetings, events, trainings, exchange programmes),
- 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,
- Other contact points or local counterparties (co-organisers/ capacity building or analysis 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.

Which types of data are being processed?

Contact data	<ul style="list-style-type: none"> • First name • Last/family name • Email address • Office/ mobile phone
Professional data	<ul style="list-style-type: none"> • Title/rank/function • Country/ Organization • Professional qualifications
User Generated Data	<ul style="list-style-type: none"> • Online meeting and call recordings • Transcriptions of recordings of meetings • Uploaded files during online meetings

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

<p>Travel information</p>	<ul style="list-style-type: none"> • Passport/ID number and validity • 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"> • Gender • Date of birth • Nationality • Dietary and/or special requirements

How is the data processed?

Data is mainly processed manually. The International Cooperation Unit (ICU) receives in electronic format a list of nominees, via the participating Law Enforcement Authorities in partner countries and International Organisations. The ICU team assesses the nominations and provides its feedback to the respective sending organisation/ country regarding the selected participants.

For the selection of subject matter experts/trainers, CEPOL receives the data directly via the Registration form and the Trainer Professional Background form each subject matter expert/trainer has to complete. All participants 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 the relevant CEPOL staff. Personal data is also processed using different ICT applications. This processing is defined in the relevant privacy statement.

Nominated contact points and participants

In the case of participants and points of contact, the data processing takes place during and only for the purposes of successful delivery of each respective activity/set of activities, including:

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

Additionally, the following data processing might take place:

- Residential activities

The contact data of selected participants and contact points 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 trainers, CEPOL external experts/ staff members and European Union Agencies involved in specific project activities, in order to ensure the logistical and administrative preparation, implementation, 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 participants

- Exchange, Mentoring Programmes and study-visits

The contact data and professional qualifications of a data subject might be shared with CEPOL staff members, European Union Agencies involved in specific project activities. These data can also be shared with the coordinator(s) or the host entity(ies) in the context of a specific programme or study-visit, specifically in order to shortlist relevant candidates, ensure appropriate placing and communication, and facilitate accommodation and travel arrangements. The data processing takes place on an operational and administrative basis. For photos, videos and dissemination of personal data to other participants the legal basis for processing is prior consent by the participants

For exchange and mentoring programmes, please refer to the Privacy Statement on CEPOL ICU Exchange and Mentoring Programme available: <https://www.cepola.europa.eu/data-protection>.

- Operational Training Needs Assessment (OTNA)

The contact and professional information of a data subject may be collected through the OTNA questionnaire. This questionnaire shall be only accessible to the relevant CEPOL staff members and CEPOL contracted experts.

The results of the questionnaire will be anonymized in a summary report. This report will not contain personal data and may be shared with CEPOL staff members engaged in the assessment, CEPOL contracted experts and officials of the Institutions/ Agencies of the European Union participating in the Project.

- Online activities

User generated data, as well as contact data might be used by CEPOL for administrative purposes, namely the recording and documentation of online activities, as well as for monitoring purposes. This data may also be accessible to the online platform in which the activity takes place and other participants in the same activity (if applicable). Additionally, the professional qualifications of a data subject might be shared with trainers, CEPOL external experts/ staff members and European Union Agencies involved in specific project activities in order to shortlist relevant candidates and ensure appropriate placing and communication.

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

Trainers and short-term experts

In the case of trainers and short-term experts, the processing of data enables the responsible Evaluation Committee to assist CEPOL in the framework of the relevant projects to identify

the eligible candidates to enter the Short Term expert pool, and later on, the responsible activity manager to identify the most suitable trainers for each activity.³ The processing of data of trainers, remunerated or not, serves the logistical, administrative and security purposes mentioned above with regard to the processing of data of participants.

Who are the recipients of the data being processed?

- Dedicated CEPOL staff members, including staff handling administrative matters and travel arrangements, as well as the horizontal structure of the International Cooperation Unit for monitoring, evaluating and reporting purposes,
- Dedicated CEPOL staff and contracted experts only in so far as the data is necessary for the purpose of the Operational Trainings Needs Analysis,
- National Exchange Coordinators and Single Points of Contact, in so far as this is necessary in relation to the outcome of the matching process for exchange and mentoring activities, including contact information and professional qualifications of the candidates to be hosted,
- 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 training events that have provided consent to share personal data with other participants.
- Other EU institutions, agencies and bodies that have a working arrangement with CEPOL or are involved in the projects,
- Other international organizations 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

³ 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>

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. 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. 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 5 years 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 National Exchange coordinators or 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.