



PROTECTION OF YOUR PERSONAL DATA

This privacy statement provides information about the processing and the protection of your personal data.

Processing operation: *Online Election of Staff Committee*

Data Controller: The European Union Agency for Law Enforcement Training, Staff Committee

Record reference: DPR-CEPOL-2024-0030

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1. Introduction

The European Union Agency for Law Enforcement Training (hereafter 'CEPOL') is committed to protect your personal data and to respect your privacy. CEPOL collects and further processes personal data pursuant to [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 (repealing Regulation (EC) No 45/2001).

This privacy statement explains the reason for the processing of your personal data, the way we collect, handle and ensure protection of all personal data provided, how that information is used and what rights you have in relation to your personal data. It also specifies the contact details of the responsible Data Controller with whom you may exercise your rights, the Data Protection Officer and the European Data Protection Supervisor.

The information in relation to processing operation "*Online Election of Staff Committee*", undertaken by The European Union Agency for Law Enforcement Training, Staff Committee is presented below.

2. Why and how do we process your personal data?

Purpose of the processing operation: CEPOL collects and uses your personal information to set up a Staff Committee within CEPOL.

Your personal data will not be used for an automated decision-making including profiling.

3. On what legal ground(s) do we process your personal data

We process your personal data, because, according to Article 5(1) (b) of Regulation (EU) 2018/17125, the processing is necessary for compliance with a legal obligation to which the controller is subject.

Legal basis:

- Regulation (EU) 2015/2219¹ 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 (EEC) No 31, 11 (EAEC),² laying down the Staff Regulations of Officials ("Staff Regulations") and the Conditions of Employment of Other Servants of the European Economic Community and the European Atomic Energy Community ("CEOS"), in particular Article 9 and Annex II to the Staff Regulations.
- Decision of the Management Board 26/2019/MB on setting up a Staff Committee of 20 November 2019.

¹ OJ L 319, 4.12.2015 p. 1-20.

² OJ 45, 14.6.1962, p. 1385

We do not process **special categories of personal data**, therefore Article 10 of the Regulation does not apply.

4. Which personal data do we collect and further process?

In order to carry out this processing operation, CEPOL collects the following categories of personal data:

- **Concerning the voters:** first name, family name, category of staff, email address and date of entry to service, date of end of the contract.
- **Concerning the candidates:** first name, family name, email address, category of staff in CEPOL, date of entry to service, date of end of the contract.

Access to elaborate the list of electors and candidates is done on a need-to-know basis. Once the list is elaborated, **it is published internally** and, therefore, accessible to all candidates and voters:

- List of voters contains the following personal data: first name, family name.
- List of candidates contains the following personal data: first name, family name, category of staff, number of the candidate in the list, number of order in the list.

Personal data of candidates are collected via a candidate form including name, surname, category of employment (TA/CA), introduction/motivation statement (voluntary), date and signature.

CEPOL is using EUSurvey survey platform to manage on-line voting. EU Survey services are provided via the European Commission. The following categories of personal data is processed:

User credentials

To be identified by the system, the user needs a couple login / password, which is managed by the EULogin service.

For further information on how EULogin is processing your personal data, please refer to the [EULogin privacy statement](#).

User data

Personal data is accessible from the EUSurvey application under the 'Settings' tab:

- Full name (first and family name)
- Email address
- Type of contract (temporary staff, contract staff or seconded national expert) for candidates standing for elections only.

Analytics:

EUSurvey uses the Europa Analytics service for traffic statistics and analytics. For further information see the Europa Analytics website.

The provision of personal data is mandatory to meet a statutory requirement: Staff Regulation. If you do not provide your personal data, we will not be able to fulfil our obligations.

5. How long do we keep your personal data?

CEPOL only keeps your personal data for the time necessary to fulfil the purpose of collection or further processing, namely:

- **User contact details:** The Commission only keeps user personal data for the time necessary to fulfil the purpose of the survey. In particular: staff member (EU Login internal user). As long as the person is a CEPOL staff member, the EU Login and EUSurvey user account remains active and the personal data is therefore retained. However, the staff member can, at any time, ask the EUSurvey team to terminate the account if they no longer wish to use the service. In this case, the user account, all associated data and all surveys and results will be permanently deleted.

6. How do we protect and safeguard your personal data?

All personal data in electronic format (e-mails, documents, databases, uploaded batches of data, etc.) are stored either on the servers of CEPOL or of its contractors.

CEPOL's contractors are bound by a specific contractual clause for any processing operations of your data on behalf of CEPOL, and by the confidentiality obligations deriving directly from the General Data Protection Regulation in the EU Member States ('GDPR' [Regulation \(EU\) 2016/679](#).)

For the European Commission, Regulation (EU) 2018/1725 applies. In addition, all processing operations are carried out pursuant to the Commission Decision (EU, Euratom) 2017/46 of 10 January 2017 on the security of communication and information systems in the European Commission.

In order to protect your personal data, CEPOL has put in place a number of technical and organisational measures in place. Technical measures include appropriate actions to address online security, risk of data loss, alteration of data or unauthorised access, taking into consideration the risk presented by the processing and the nature of the personal data being processed. Organisational measures include restricting access to the personal data solely to authorised persons with a legitimate need to know for the purposes of this processing operation.

7. Who has access to your personal data and to whom is it disclosed?

Access to your personal data is provided to CEPOL staff responsible for carrying out this processing operation and to authorised staff according to the "need to know" principle. Such staff abide by statutory, and when required, additional confidentiality agreements.

Within CEPOL:

In particular, CEPOL staff members (i.e. temporary staff, contract staff and other categories of staff referred to in Article 1 of CEOS, if any) eligible to vote and stand for election, in line with the rules governing the election of the Staff Committee.

Before the election, the list of staff members eligible to vote and stand shall be published internally. This list contains family name, first name(s), type of employment contract and starting date of the contract.

Outside CEPOL:

- **European Commission Staff** (EUSurvey operation team and Infrastructure administrators): for the purpose of enabling the user to connect to the EUSurvey application and use the service for creating and publishing online questionnaires. The user's contact details (email address, first name and last name) may also be used for contacting the user for support and quality management purposes.
- **Internal Audit Service of the Commission, Legal Service, OLAF** upon request and only if necessary in the context of official investigations or for audit purposes.

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.

8. What are your rights and how can you exercise them?

You have specific rights as a 'data subject' under Chapter III (Articles 14–25) of Regulation (EU) 2018/1725, in particular the right to access, your personal data and to rectify them in case your personal data are inaccurate or incomplete. Where applicable, you have the right to erase your personal data, to restrict the processing of your personal data, to object to the processing, and the right to data portability.

You have the right to object to the processing of your personal data, which is lawfully carried out pursuant to Article 5(1)(b) on grounds relating to your particular situation.

You can exercise your rights by contacting the Data Controller, or in case of conflict the Data Protection Officer. If necessary, you can also address the European Data Protection Supervisor. Their contact information is given under Heading 9 below.

Where you wish to exercise your rights in the context of one or several specific processing operations, please provide their description (i.e. their Record reference(s) as specified under Heading 10 below) in your request.

9. Contact information

- The Data Controller

If you would like to exercise your rights under Regulation (EU) 2018/1725, or if you have comments, questions or concerns, or if you would like to submit a complaint regarding the collection and use of your personal data, please feel free to contact the Data Controller:

staff-committee@cepol.europa.eu

- The Data Protection Officer (DPO) of CEPOL

You may contact the Data Protection Officer (dpo@cepol.europa.eu) with regard to issues related to the processing of your personal data under Regulation (EU) 2018/1725.

- The European Data Protection Supervisor (EDPS)

You have the right to have recourse (i.e. you can lodge a complaint) to the European Data Protection Supervisor (edps@edps.europa.eu) if you consider that your rights under Regulation (EU) 2018/1725 have been infringed as a result of the processing of your personal data by the Data Controller.

10. Where to find more detailed information?

CEPOL Data Protection Officer (DPO) publishes the register of all processing operations on personal data by CEPOL, which have been documented and notified to them. You may access the register via the following link: <https://www.cepola.europa.eu/data-protection>

This specific processing operation has been included in the DPO's public register with the following Record reference: **DPR-CEPOL-2024-0030 Online Election of Staff Committee.**