

PROTECTION OF YOUR PERSONAL DATA

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

Processing operation: *CEPOL Legal services*

Data Controller: CEPOL Strategic Planning and Directorate Unit (CEPOL SPDU)

Record reference: DPR-CEPOL-2025-0022

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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 "CEPOL Legal services", undertaken by CEPOL SPDU is presented below.

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

Purpose of the processing operation: CEPOL SPDU collects and uses your personal information for the following purposes:

- Providing legal advice and opinions to CEPOL staff and management.
- Supporting administrative, disciplinary, ethics, whistleblowing and harassment procedures.
- Ensuring compliance with EU law, internal rules, and governance obligations.
- Coordinating with legal networks of other EU agencies on matters of common interest.
- Managing correspondence and case files related to legal matters across all CEPOL units.
- Delivering, recording participation and monitoring legal and compliance related training activities for CEPOL staff, including mandatory and optional trainings.

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) of Regulation (EU) 2018/17125:

- (a) Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Union institution or body;
- (b) Processing is necessary for compliance with a legal obligation to which the controller is subject.;
- (c) Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.;

- (d) The data subject has given consent to the processing of his or her personal data for one or more specific purposes.
- (e) Processing is necessary in order to protect the vital interests of the data subject or of another natural person.

Legal basis:

- Implementation of the CEPOL Regulation and internal governance framework,
- Fulfilment of obligations under the Staff Regulations (disciplinary, ethics, whistleblowing).

We process special categories of personal data, therefore Article 10 of the Regulation applies. In particular, we may need to process: racial or ethnic origin; political opinions; religious or philosophical beliefs; trade union membership; genetic data, biometric data for the purpose of uniquely identifying a natural person; data concerning health; sexual orientation or sex life.

We process special categories of personal data indicated in Section 4, because, according to Article 10(2) of Regulation (EU) 2018/1725:

- you have given explicit consent to the processing of those personal data for one or more specified purposes;
- the processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security;
- the processing is necessary to protect your vital interests or of another person where you are physically or legally incapable of giving consent;
- the processing relates to personal data which are manifestly made public by you;
- the processing is necessary for the establishment, exercise or defense of legal claims or whenever the Court of Justice of the European Union is acting in its judicial capacity;
- the processing is necessary for reasons of substantial public interest;
- the processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services;
- the processing is necessary for reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health or ensuring high standards of quality and safety of health care and of medicinal products or medical devices;
- the processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes [...].

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

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

- Identification data (name, position, unit, contact details),
- Employment-related information (role, responsibilities),
- Case-related information (facts, allegations, procedural documents),

- Sensitive data where strictly necessary (e.g., disciplinary allegations, whistleblowing information),
- Internal notes, legal assessments, correspondence, and
- Register entries (date, subject, requesting Unit, status and follow up).

Training Activities

Identification data (name, unit, position), attendance and completion status. Recording of the session.

The provision of personal data is mandatory to meet a legal obligation: CEPOL Regulation and Staff Regulation. If you do not provide your personal data, we will not be able to follow up your request or request from CEPOL Units.

5. How long do we keep your personal data?

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

- Legal advice files: 5 years according to CEPOL's document management policy.
- Handling of complaints and inquiries: files related to the handling of legal claims and complaints from externals or staff to support the CEPOL departments, including complaints to CEPOL about maladministration and infringements of data protection rules and of the Code of Good Administrative Behaviour as OMBUDSMAN and OLAF: 10 years. After this, data will be kept according to the archival policy.
- Legal case, court proceedings and litigation activities: files for cases where CEPOL appears before national, European or international courts as well as other jurisdictions or arbitral tribunals as the applicant, defendant or intervening party, depending on the case: 5 years with the possibility to be kept in line with the archival policy.
- Training participation records: retained for 1 year after the end of the training cycle.

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.

Depending on the nature of the consultation, the information may be accessed by the Executive Director and the ED Office, as they oversee the coordination and governance of legal matters.

The data may also be shared with the relevant Units or Sectors that are directly involved in the issue, but always on a strict need-to-know basis to ensure confidentiality and proportionality. In addition, certain Sectors within the Agency, such as Human Resources, Finance, Procurement, Security, or the Data Protection Officer, may receive the information when their involvement is necessary for the proper handling of the request or for ensuring compliance with internal and regulatory obligations.

Outside CEPOL:

In certain situations, the data may be shared with recipients outside CEPOL when this is required for the proper handling of a legal matter or for compliance with institutional or regulatory obligations. This may include the Agency's external legal representatives when legal expertise or representation is needed.

Depending on the nature of the case, information may also be transmitted to other EU institutions or agencies, but only when their involvement is necessary for the resolution of a specific issue.

In addition, the data may be provided to bodies such as OLAF, the EPPO, the EDPS, the European Ombudsman, courts, or other competent authorities when the circumstances of the case require their intervention or when the Agency is legally obliged to cooperate with them. Participation in legal networks may also involve sharing information, although in such contexts the material is presented in an anonymised or aggregated form unless the matter concerns a joint case that requires more detailed information to be exchanged.

We do not foresee the publication of personal data.

This process of personal data does not imply any transfer of personal data to countries outside of the European Union or any international organisation.

Please note that pursuant to Article 3(13) of the Regulation, public authorities (e.g. Court of Auditors, EU Court of Justice) which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients. The 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.

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)(a) 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:

legal@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.cepol.europa.eu/data-protection>

This specific processing operation has been included in the DPO's public register with the following Record reference: DPR-CEPOL-2025-0022CEPOL Legal services.