

<b>Privacy Statement</b>	Document number: RE.DAPR.015-1
	Approval date: 14 APR 2015

## Privacy Statement for Processing Personal Data Enlisted in Declarations of Interest and CVs

Regulation (EC) 45/2001 applies to the processing of personal data carried out by CEPOL. Further to Article 11 and Article 12 of the Regulation, the CEPOL provides the Data Subjects with the following information:

<b>Data Controller</b>	Director
<b>Purpose of processing</b>	The purpose of processing is to safeguard the independency of CEPOL and its constituent bodies
<b>Data Subjects</b>	<p>CEPOL staff members (Temporary Agents, Contract Agents)</p> <p>Other stakeholders directly collaborating with the agency but not employed by CEPOL:</p> <ul style="list-style-type: none"> <li>• members of the Governing Board</li> <li>• National/Organisational Contact Points</li> <li>• Course Managers</li> <li>• National e-Net Managers</li> <li>• National Exchange Programme Coordinators</li> <li>• Research and Science Correspondents</li> <li>• Common Curricula advisers</li> <li>• Members of working groups (incl. the Audit Panel and other bodies established by GB Decisions)</li> <li>• experts (incl. Seconded National Experts, Module Advisors, educational experts; nominees to the Lecturers, Trainers and Researchers Database),</li> <li>• Interims</li> <li>• Trainees</li> <li>• Contractors</li> <li>• Local staff contracted or provided by the host country authorities to CEPOL (e.g., security, mail/courier, cleaning, maintenance services)</li> </ul> <p>To all Data Subjects above, also those of possible household members</p>
<b>Data categories</b>	<p>The following personal data from Declarations of Interest are collected, processed and stored:</p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Organisation</li> <li>• Legal address</li> <li>• Position/CEPOL involvement</li> <li>• Information on direct or indirect interests of relevance to the mission of CEPOL</li> <li>• Details on the name of body or organisation of relevance for each declared interest</li> <li>• Details on the subject matter of each declared interest, the domain in which the activity is, or was, carried out and clarifying the interest and role of the concerned body or organisation in the matter and the role of the concerned person</li> </ul>

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	<p>The following personal data from CVs (senior management, GB Members) are collected, processed and stored:</p> <p>Personal information</p> <ul style="list-style-type: none"> <li>• First name(s) / Surname(s)</li> <li>• Address(es)</li> <li>• Mobile</li> <li>• Fax(es)</li> <li>• E-mail(s)</li> <li>• Nationality</li> <li>• Date of birth</li> <li>• Gender</li> </ul> <p>Work experience</p> <ul style="list-style-type: none"> <li>• Dates</li> <li>• Occupation or position held</li> <li>• Main activities and responsibilities</li> <li>• Name and address of employer</li> </ul> <p>Education and training</p> <ul style="list-style-type: none"> <li>• Dates</li> <li>• Title of qualification awarded</li> <li>• Principal subjects / occupational skills covered</li> <li>• Name and type of organisation providing education and training</li> </ul> <p>Personal skills and competences</p> <p>Mother tongue(s)/Other language(s)</p> <p>Social skills and competences</p> <p>Computer skills and competences</p>
<p><b>Data collection</b></p>	<p>The Common Approach on EU decentralised agencies requires that the agencies shall adopt and implement a clear policy on prevention and management of conflicts of interests.</p> <p>In line with the above requirements, CEPOL has the <i>Policy on prevention and management of potential conflict of interest</i> adopted by the Governing Board (32/2014/GB).</p> <p>The identification and handling of Conflict of Interest as defined in the policy is based on the evaluation of Annual Declarations of Interests (ADoI), Specific Declarations of Interests (SDoI), and Oral Declarations of Interests (ODoI) submitted by the concerned persons and staff.</p> <p>Signed declarations of interest are sent to and stored only electronically in the functional mailbox <a href="mailto:declarationofinterest@cepol.europa.eu">declarationofinterest@cepol.europa.eu</a>, which is accessible by the Internal Control Officer and the HR Office only. Originals (if provided) are stored in Personal Files of staff members.</p> <p>The information is protected by the generic measures concerning e-security in CEPOL.</p> <p>Annual Declarations of Interests of the Governing Board Members, Director and senior management of CEPOL are published together with their CVs on the Agency's website by the CEPOL webmaster.</p>

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<b>Data recipients</b>	<p>In case of non-conflict of interest:</p> <ul style="list-style-type: none"> <li>• Internal Control Officer</li> <li>• HR Office</li> <li>• General public (via CEPOL website)</li> </ul> <p>In case of conflict of interest:</p> <ul style="list-style-type: none"> <li>• Internal Control Officer</li> <li>• HR Office</li> <li>• Line Managers / Head of Corporate Service / Deputy Director</li> <li>• Chair of the Governing Board / Reporting Officers designated by the Governing Board</li> </ul>
<b>Nature of response</b>	Data Subjects are required to provide their personal data as specified above. Failure to do so will not allow Data Subjects to participate into CEPOL activities.
<b>Data retention</b>	<p>Personal data collected from the CEPOL Director are kept for a maximum period of 5 years after the discharge for the budgetary year in which the Director terminates the mandate at CEPOL.</p> <p>Personal data collected from CEPOL staff members is stored for a maximum period of 5 years.</p> <p>Personal data collected from all other Data Subjects are kept for a maximum period of 5 years after the discharge for the budgetary year to which the DoI relates.</p>
<b>Right to access, to rectify, to block, to erase, to object data</b>	<p>Data Subjects have the right to access their personal data and the right to correct any inaccurate or incomplete personal data.</p> <p>Data Subjects can obtain from the Data Controller the rectification of inaccurate or incomplete personal data concerning them.</p> <p>Data Subjects have the right to obtain from the Data Controller the blocking and erasure of the data.</p> <p>Data Subjects have the right to object to the processing of the data.</p> <p>Data Subjects can refuse and/or withdraw their consent with respect to further processing of their personal data.</p> <p>Substantiated requests should be e-mailed to the Data Controller at <a href="mailto:declarationofinterest@cepol.europa.eu">declarationofinterest@cepol.europa.eu</a>. Time limit to block/erase on justified legitimate requests from the Data Subjects is 15 working days starting from the date of receipt of such request.</p> <p>General requests can be e-mailed to the CEPOL Data Protection Officer at <a href="mailto:DPO@cepol.europa.eu">DPO@cepol.europa.eu</a>.</p>
<b>Right to obtain notification to third parties</b>	<p>The data provided to the general public (via CEPOL website) is disclosed without a notification to Data Subjects.</p> <p>The data disclosed for the auditing or investigation purposes is notified to Data Subjects.</p>

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<b>Legal basis of the processing operation</b>	<p>Article 5(a) of Regulation (EC) 45/2001</p> <p>Article 5(b) of Regulation (EC) 45/2001 (if the processing of DoI is provided by a legal act of a higher order, e.g. the Treaty on the Functioning of the European Union, the Staff Regulations of Officials and the Conditions of Employment of Other Servants (CEOS) of the European Union; the legal basis may differ according to the type of person working for CEPOL)</p> <p>32-2014-GB CEPOL Policy on management of conflict of interest</p> <p>Article 5(c) of Regulation (EC) 45/2001 (if the processing is necessary for the performance of a contract to which the data subject is a party)</p> <p>Article 57 of the Financial Regulations (for financial actors and other persons involved in budget implementation and management)</p>
<b>Contact information</b>	<p>Data Controller: <a href="mailto:declarationofinterest@cepol.europa.eu">declarationofinterest@cepol.europa.eu</a></p> <p>Data Protection Officer: <a href="mailto:DPO@cepol.europa.eu">DPO@cepol.europa.eu</a></p>
<b>Right to have recourse</b>	<p>Data Subjects shall have right of recourse at any time to the European Data Protection Supervisor (<a href="mailto:EDPS@edps.europa.eu">EDPS@edps.europa.eu</a>).</p>