

## Privacy Statement for Processing Personal Data in CEPOL's e-Net<sup>1</sup>

This privacy statement, in line with Articles 15 and 16 of [Regulation \(EU\) 2018/1725](#)<sup>2</sup>, 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?

Preparation, implementation and evaluation of CEPOL learning products and training activities in a restricted online platform (the so-called e-Net).

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

Regulation (EU) 2018/1725 and in particular Article 5(1)(a) and (d).

Regulation (EU) 2015/2219 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<sup>3</sup> and in particular Article 4(2)(a) and 4(3).

### Who is the data controller?

The data controller is Mrs Agnieszka Biegaj, [training@cepol.europa.eu](mailto:training@cepol.europa.eu), Head of Training Unit.

### Who are the data subjects?

All e-Net registered users.

### Which types of data are being processed?

#### 1. For the purposes of e-Net user administration

All the data that users are requested to provide during their registration application process to e-Net. More particularly:

- a) First name and family name
- b) City
- c) Country
- d) Email address
- e) Title and Job title
- f) Postal address

<sup>1</sup> This includes all sub-systems and applications of e-Net that the user has access to, upon approval of his/her registration to e-Net. The right to modify these sub-systems and applications is reserved dependent on the development of new products or services on e-Net.

<sup>2</sup> 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.

<sup>3</sup> OJ L 319, 4.12.2015, p.1.

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- g) Telephone
- h) Username (automatically derived from the email address)
- i) Password
- j) Registration date
- k) Last login date
- l) User registration status for e-Net (active, pending e-Net manager confirmation, disabled, rejected, expired, cancelled by user, incomplete user registration, timed out registration)
- m) Assigned role for e-Net (normal, academic)
- n) GDPR consent status (date and time given)

## ***2. For the purposes of Learning Management System (LMS)***

All information that can be associated with a natural person. All Moodle user account details and all the activity associated with that user. This also extends to associated information such as web server log files.

User Account Details consist of the following of items:

- a-d same as in Category 1: e-Net user administration
- Profile picture
- Personal description
- Language settings

User activity consists of the following:

- First and last access to LMS, last IP address from which the user accessed the system
- Access and/or contribution to course pages and to particular activities and/or resources of the course pages
- Certificates of completed or attended training
- Photos taken during the training (if applicable) Grades obtained for the training activities attended (if applicable)

## ***3. For the purposes of Webinars***

- a) First name and family name
- b) Email address
- c) Country
- d) Law enforcement domain
- e) Organisation
- f) Date and time of attendance of webinar
- g) Answers provided during polls at the webinar
- h) Answers provided at the evaluation after the webinar

## ***How is data processed?***

For the purposes of **e-Net user administration**, depending the origin of the data subject, registrations are processed by the e-Net managers of the CEPOL National Units, the National Contact Points and the staff of partner EU organisations respectively.

For the purposes of the **LMS**, participants, experts, trainers, lecturers and e-Net managers are nominated by the relevant authority. These nominations are then forwarded to the Training Unit for further processing into the LMS per training activity.

For the purposes of **webinars**, registrations are provided directly by the prospective participant and data is processed by the webinar organisers and webinar administrators at the Training Unit.

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**Who are the recipients of the data being processed?****CEPOL staff:**

- Officers in the Training Unit responsible for preparing, implementing and evaluating the learning and training activities subject to this privacy statement;
- Actors in the financial workflow (if relevant);
- Communications Team (if relevant);
- CEPOL Internal Audit Panel and/or the Internal Control Officer (if relevant);
- EU bodies: 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 (upon request).

**Other recipients:**

- Relevant managers of each learning and training activity subject to this privacy statement originating from the CEPOL National Units, the National Contact Points or the Organisational Contact Points (upon request);
- CEPOL National Units or National Contact Points or Organisational Contact Points (upon request for data linked to users from their own country or organisation);
- Service providers for the CEPOL e-Net, the LMS platform and the CEPOL webinars;
- General public primarily through the CEPOL website and social media channels (if relevant).

**Is data transferred to third countries or international organisations?**

CEPOL has concluded working arrangements with some countries outside of the European Union/European Economic Area. As a result, as far as the cooperation with these countries entails access to CEPOL's e-Net, and to the LMS, transfer of data to parties outside of the EU/EEA may take place. In such cases, Chapter V of Regulation (EU) 2018/1725 in relation of personal data to third countries or international organisations applies.

**What rights do data subjects have?**

Data subjects have the right to access their personal data and the right to request from the controller a copy or the deletion of their 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, data subjects have the right to receive their personal data in a structured, commonly used and machine-readable format.

A data extraction or deletion request for LMS can be initiated from the personal profile page of each user in the LMS. Once the request has been submitted by the user, the time limit to extract/erase data on justified grounds at the request of data subjects is 15 working days from the date of receipt of such a request.

A data extraction or deletion request from the e-Net and all its sub-systems (excluding the LMS) should be emailed to the data controller Mrs Agnieszka Biegaj, Head of Training Unit, [training@cepol.europa.eu](mailto:training@cepol.europa.eu).

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General requests can be emailed to the CEPOL Data Protection Officer at [DPO@cepol.europa.eu](mailto:DPO@cepol.europa.eu) (can be also made through the relevant link on the user's LMS profile page).

### How long is your data retained by CEPOL?

Data from the profile of the e-Net users are stored on the e-Net for as long as the users are registered and remain active. Active users are those who have logged on to e-Net within the last twelve months at any given date of the year. The e-Net accounts of inactive users are deleted. With this, the inactive users' personal data and their enrolments to all courses on the LMS are also deleted.

Data of members of platforms for communities of practice, including the Webinar Resources, are stored on the Learning Management System of e-Net for as long the user is active on e-Net and a member of the platform.

Data shall be erased from the Learning Management System (LMS) of e-Net in January/February every year for scheduled activities such as courses, online courses, CEPOL Exchange Programme and the European Joint Master Programme, which have been closed in year N-3.

### 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](mailto:dpo@cepol.europa.eu).

#### European Data Protection Officer (EDPS)

The [European Data Protection Officer](#) 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 Mrs Agnieszka Biegaj, Head of Training Unit, [training@cepol.europa.eu](mailto:training@cepol.europa.eu). You may also inform 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 of recourse to lodge a complaint with the EDPS, as provided for by Article 63 of Regulation (EU) 2018/1725.