

Privacy Statement for Processing Personal Data in the context of stakeholder surveys

This privacy statement, 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?

Personal data are collected from survey data² for the purpose of obtaining feedback on CEPOL's work and activities in the context of stakeholder surveys conducted by the Agency, i.e. general and specific stakeholder surveys or consultations, website user-insight surveys, and/or staff consultations.

The objective of carrying out surveys is to improve the quality of the Agency's work in relation to its stakeholders and to report on performance.

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

Regulation (EU) 2015/2219³ 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 (EU) 2018/1725 and in particular Article 5 (1) (a) and (d)

Who is the data controller?

The data controller is the Executive Director, Executive.Director@cepol.europa.eu

Who are the data subjects?

CEPOL's stakeholders and partners, including staff and website users taking part in a CEPOL's survey.

Which types of data are being processed?

The following data are processed anonymously, unless stated otherwise, in each survey:

- Opinions
- Insights
- Feedback

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.

² Defined as the resultant data that is collected from a sample of respondents that took a survey.

³ OJ, L 319, 4.12.2015, p.1.

Privacy Statement	Document number: FO.DAPR.041
	Approval date: 29/01/2021

- Input
- Statements
- Views

The following personal data can also be processed if so indicated in the survey form:

- Name
- Contact details (including email address)
- Job title
- Employer
- Nationality
- Age group
- Sex

How is data processed?

CEPOL is using survey applications to carry out internal and external surveys (e.g. EU Survey⁴). The data collected is processed and analysed in the form of aggregated results. When analysis is carried out, this is done in such a way to ensure that respondents are not identifiable.

CEPOL carries out its surveys anonymously. Depending on the topic, CEPOL may also invite survey respondents to leave their personal data, e.g. for follow-up to the survey. In those cases, such option is voluntary and how the processing of data is performed is clearly indicated.

During surveys, CEPOL collects mainly subjective data (e.g. opinions or experience about statements presented, level of satisfaction). For non-anonymous surveys, CEPOL may collect administrative data about the respondent (depending on the circumstances this may include name, organisation, contact details, job title, employer, nationality, age group, sex). In this case, the consent of the respondent to process its personal data shall be asked as a prerequisite to complete the survey. Personal data is not used for an automated decision-making including profiling or for marketing purposes.

Who are the recipients of the data being processed?

Personal data are only accessible to:

- CEPOL staff on a strictly need-to-know basis (e.g. Communications Office staff for the purpose of website surveys).
- 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:

⁴ EUSurvey is an online survey management system for creating and publishing forms available to the public, e.g. user satisfaction surveys and public consultations. The application, hosted at the European Commission's Department for digital services (DG DIGIT), is available free of charge to all EU citizens and administrations (<https://ec.europa.eu/eusurvey/home/about>)

Privacy Statement	Document number: FO.DAPR.041
	Approval date: 29/01/2021

Occasionally, CEPOL makes use of contractors and third-party platforms for carrying out the surveys or consultation exercises (e.g. EU Surveys). Therefore, the staff managing these survey applications have access to your personal data. This includes:

- Survey service provider's team for purposes of system support and maintenance.
- The infrastructure administrators.

As processors, these subcontractors and third-party platforms abide by the same strict level of confidentiality applied within CEPOL and therefore they do not:

- Disclose respondents' email address
- Treat respondents' data individually, but analyse only in an aggregated form, anonymously
- Publish or disclose respondents' personal data to any party other than CEPOL staff.
- Share or make use of personal data for marketing purposes.

Is data transferred to third countries or international organisations?

CEPOL does not transfer personal data to third countries or international organizations. The platforms being used to collect data (e.g. ec.europa.eu/eusurvey) and CEPOL's contractors are located within the European Union.

The data CEPOL collects through surveys is not transferred to any third party, except to the extent and for the purpose CEPOL may be required to do so by law.

What rights do data subjects have?

Participating in CEPOL's feedback or survey exercises is voluntary.

Data subjects have the right to access their personal data and the right to request from the controller rectification or erasure of personal data. Internal and external users have the right to request, at any time, the survey service provider to terminate their 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.

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.

Substantiated requests should be emailed to Executive.Director@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.

How long is data retained by CEPOL?

CEPOL only retains personal data for the time necessary to fulfil the purpose of the survey.

Privacy Statement	Document number: FO.DAPR.041
	Approval date: 29/01/2021



CEPOL staff members as EUSurvey internal user

For CEPOL staff members, the account remains active and personal data is therefore retained as long as the staff member is employed by CEPOL. However, any time, the staff member may ask the survey service provider to terminate the account if requested. In this case, the user account, all associated data and all surveys and results will be permanently deleted.

EUSurvey external users

An external user, may at any time, request EU Survey to terminate the account. The corresponding account, all associated data, and all surveys and results will be permanently deleted.

In addition, unused external user accounts are deleted after a period of inactivity of **2 years**.

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 Executive Director, Executive.Director@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 of recourse to lodge a complaint with the EDPS, as provided for by Article 63 of Regulation (EU) 2018/1725.