

<b>Privacy Statement</b>	Document number: FO.DAPR.038-1
	Approval date: 30.04.2020



## Privacy Statement for Processing Personal Data related to the CEPOL e-newsletters and news alerts

This privacy statement, in line with Articles 15 and 16 of [Regulation \(EU\) 2018/1725](#)<sup>1</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?

Personal data are collected for the purposes of subscription and management of e-newsletters/news alerts for external and internal communication (mailing lists), focusing on important announcements, developments, activities, initiatives or thematic issues in the area of CEPOL's activity. In addition, personal data may appear in the articles, reports, interviews, as well as the visual content of the e-newsletters/news alerts. The preparation, development and dissemination of CEPOL e-newsletters/news alerts is done via electronic means.

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

Regulation (EU) 2015/2219<sup>2</sup> 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 Dr. *h.c* Detlef Schroeder, CEPOL Executive director, [Executive.director@cepol.europa.be](mailto:Executive.director@cepol.europa.be)

### Who are the data subjects?

- Any natural person who is interested in receiving the e-newsletters/news alerts of CEPOL.
- Any natural person who has provided his/her consent to appear in the visual content of the e-newsletters/news alerts, or has provided an interview to be published there.

<sup>1</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>2</sup> OJ, L 319, 4.12.2015, p.1.

<b>Privacy Statement</b>	Document number: FO.DAPR.038-1
	Approval date: 30.04.2020

- CEPOL staff members (including SNEs, interim workers and trainees) (only for internal newsletter).

### Which types of data are being processed?

For the purposes of **subscription and dispatch**: Data necessary to ensure the inclusion of the natural person in the delivery of the service. This refers in particular to: email address (either corporate or personal) where the name, and/or surname, and/or place of employment of a natural person may appear.

In addition to the above, the tool used for dispatch keeps a log of the following user interactions:

- Frequency with which the data subject opens the newsletter/news alerts
- Clicks per content
- Content downloaded
- Opt-out (un-subscription)

We collect this information to observe where the interest of readers lay and to improve the quality of the content provided by CEPOL through newsletters or news alert.

The **creation of the content** may entail the use of photos or videos as well as of opinions expressed in interviews.

### How is data processed?

Subscriptions for the e-newsletters/news alerts are collected and processed through:

- CEPOL's Communications Office functional mailbox; where the interested parties can express their interest to be included in the relevant emailing list;
- a subscription panel available on CEPOL's website;
- CEPOL's mailing application.

The management of the subscriptions, the compilation of the content and the dispatch of the e-newsletters/news alerts is based on the use of a third-party platform that acts as service provider and has the role of data processor. The platform has in place features that comply with data protection requirements stemming from Regulation (EU) 2016/679 (the so-called 'GDPR').

### Who are the recipients of the data being processed?

- Staff in the Communications Office of CEPOL responsible for preparing the e-newsletters/news alerts subject to this privacy statement;
- Recipients of the e-newsletters/news alerts (only in relation to personal data appearing in the content);
- CEPOL Internal Audit Panel and/or the Internal Control Officer (if relevant);

<b>Privacy Statement</b>	Document number: FO.DAPR.038-1
	Approval date: 30.04.2020



- 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:

- Third-party that acts as a service provider providing the platform used for the compilation and dispatch of the e-newsletters/news alerts (Sendinblue) including sub-contractors that the later may use.

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

CEPOL does not transfer personal data to third countries or international organizations. The servers hosting the platform used for the compilation and dispatch of the e-newsletters/news alerts are located within the European Union (France). In case the need emerges, for the third-party providing the platform to have recourse to sub-processors that are not necessarily located in the European Union, the service provider undertakes to put in place all the necessary guarantees in order to supervise these transfers in compliance with the applicable rules including facilitating the signing of standard contractual clauses ‘data controller to data processor’ with the sub-processors.

### What rights do data subjects have?

Data subjects have the right to access their personal data and the right to request from the controller rectification or erasure of personal data. A request for erasure should be addressed to the data controller who will then proceed in two steps: a) delete any data stored from the side of the data controller b) transmit the request to Sendinblue that undertakes to process the request within a period of 25 days.

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. The latter is facilitated via a dedicated ‘Unsubscribe’ button easily accessible and clearly visible in the end of the e-newsletter/news alert. Upon un-subscription the data subject will stop receiving the e-newsletters/news alerts. Due to the configuration of the platform though the e-mail of the data subject will continue to exist in a list of ‘un-subscribed’ recipients. A data subject wishing to be removed from that list needs to introduce a request for data deletion.

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, with the additional caveat of the time that will be needed from the side of Sendinblue for erasure.

<b>Privacy Statement</b>	Document number: FO.DAPR.038-1
	Approval date: 30.04.2020

## How long is your data retained by CEPOL?

Personal data (e.g interviews of individuals) that appear in the content of e-newsletters/news alerts are stored as integral part of CEPOL archives in relation to CEPOL activities. In addition, the body of the e-newsletters/news alerts is kept by Sendinblue for as long as CEPOL keeps using their service. Upon discontinuation of the use of the service, Sendinblue will store such data for a period of maximum 2 years.

Data related to subscription management and dispatch are stored as long as a data subject continues receiving the e-newsletter/news alerts .

## 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 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 Dr *h.c* Detlef Schroeder, [Executive.Director@cepol.europa.eu](mailto: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.