

## Privacy Statement for the purpose of verifying the identities of the Appointed Analysis Single Points of Contact (ANASPOCS) requesting the creation of an EUROMED email account

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?

The purpose of the processing of data is to verify the identity of the users to whom an EUROMED email account is provided in order to allow their registration to the EUROMED Threat Forum.

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

- Regulation (EU) 2018/1725 and in particular Article 5 (1) (a).
- Regulation (EU) 2015/2219 and in particular Article 4(4).
- The EU funded project EUROMED Police (CEPOL EUROMED Police) regulated by Contribution Agreement No. ENI/2020/414-940 and its annexes

### Who is the data controller?

The data controller is the Head of International Cooperation Unit, [HeadofICU@cepol.europa.eu](mailto:HeadofICU@cepol.europa.eu)

### Who are the data subjects?

Law Enforcement officials in the partner countries of the EUROMED Police project for whom an email account with the domain euromed.police.eu has been created.

### Which types of data are being processed?

- Personal data in the user form: Full Name, Position, nationality of the user and back-up e-mail address.
- Proof of affiliation to a Law Enforcement Institution of the country of nationality

<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.

### How is data processed?

The data are submitted as per the authorisation form, together with an official document proving your identity and affiliation to a Law Enforcement institution of issuing country.

These documents are kept in binder, stored in a locked cupboard with limited access to the relevant staff.

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

- CEPOL Staff implementing the Euromed Project
- 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:

- Third party that acts as a service provider providing the e-mail domain used for the creation of e-mail address, including sub-contractors that the later uses.

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

Project activities in the context of International Cooperation may take place outside the EU/EEA. As a result, transfer of data to the respective counterparties of CEPOL might take place. In such cases, Chapter V of Regulation (EU) 2018/1725 in relation of personal data to third countries or international organisations applies. In particular, in absence of adequacy decision, CEPOL controls whether any of the appropriate safeguards listed in Article 48 of Regulation (EU) 2018/1725 are in place. In absence of appropriate safeguards, CEPOL request the explicit consent of the data subjects concerned, in line with Article 50(1)(a) of Regulation (EU) 2018/1725.

The servers hosting the platform providing the e-mail domain are located in Cologne, Germany.

### 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. 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 [HeadofICU@cepol.europa.eu](mailto:HeadofICU@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.

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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)

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

Personal data is stored for a maximum of 3 years after the conclusion of the EUROMED project.

#### 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 the Head of International Cooperation Unit, [HeadofICU@cepol.europa.eu](mailto:HeadofICU@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.