

Privacy Statement	Document number: FO.DAPR.048-1
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Privacy Statement for the EU-MENA Information Sharing and Analysis Network (EMISA)

This document, 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?

The purpose of processing is the establishment of the EU-MENA Information Sharing and Analysis Network (EMISA) as part of the “*CT INFLOW - Enhancing Information Exchange and Criminal Justice Responses to Terrorism in the Middle East and North Africa*” project. The purpose of this network is to bring together EU and MENA specialists acting in the area of counter-terrorism and violent extremism, in order to exchange expertise and first-hand experiences, improving information exchange and promoting cooperation to increase the overall understanding of the phenomena in the region.

These objectives are also aligned with CT INFLOW's project aims. CT INFLOW aims at contributing to prevent and disrupt terrorist networks and the activities of recruiters to terrorism, reinforcing the institutional capacity of partner countries in matters of information exchange enabling the swift exchange of terrorism-related information while maintaining a high standard of data protection as well as providing criminal justice systems with the tools to improve regional and international cooperation in the fight against terrorism

Who is the data controller?

The data controller is the Head of the International Cooperation Unit, HeadofICU@cepol.europa.eu.

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

Regulation (EU) 2015/2219 and in particular Article 4, paras (2) and (4);

Regulation (EU) 2018/1725 and in particular Article 5, para 1, (a) (b) (d);

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.

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The EU funded project Enhancing Information Exchange and Criminal Justice Responses to Terrorism in the Middle East and North Africa (CEPOL CT INFLOW) regulated by Contribution Agreement No. IFS/2019/410-531 and its annexes;

Who are the data subjects?

The data subjects in the context of the EMISA Network are:

- Selected representatives to participate as co-chairs, participants or observers in the network activities
- The participants of each EMISA planned activity (meeting, study-visit, conference or others),
- Experts and guest speakers (be it short-term experts engaged via call for expression of interest² or any other means) and CEPOL staff (acting as moderators or support staff) for the network activities,
- Other contact points or local counterparties (e.g.co-organisers in activities) in particular when their data is shared with participants and speakers for the facilitation of logistical procedures and the coordination of EMISA activities.

Which types of data are being processed?

Contact data	<ul style="list-style-type: none"> • First name • Last/family name • Email address • Office/ mobile phone
Professional data	<ul style="list-style-type: none"> • Title/rank/function • Country/ Organization • Relevant professional qualifications, including previous relevant professional experience
User Generated Data	<ul style="list-style-type: none"> • Online meeting and call recordings • Transcriptions of recordings of meetings • Uploaded files during online meetings
Travel information	<ul style="list-style-type: none"> • Passport and/or ID information

² More information on privacy statement for the Call for Expression of Interest for Individual External Experts is available here <https://www.cepola.europa.eu/data-protection>

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	<ul style="list-style-type: none"> • Visa application in the context of planned activities • Date and time of departure/arrival • Airport of departure/arrival and flight number • Accommodation details
Others	<ul style="list-style-type: none"> • Gender • Date of birth • Nationality • Dietary and/or special requirements

How is the data processed?

Data is mainly processed manually. The CT INFLOW team receives in electronic format (either via e-mail or EU-Survey³) a nomination to participate in the EMISA activities. The nomination is submitted by interested persons and/or members of the network, either in the first person or via their respective Law Enforcement Authorities, CNU's or by observer International Organisations. The EMISA team assesses their adequacy and provides its feedback to the respective network member and/or their organisations.

All network members and participating guests must complete a travel request form to allow for the organisation of travel arrangements.

Physical files are kept in locked cupboards. Personal data are also saved in the CEPOL internal drive with limited access to the relevant CEPOL staff.

Nominated Co-Chairs and Participants

In the case of co-chairs and participants, the data processing takes place for the purposes of successful delivery of each respective activity/set of activities, including:

- logistical and administrative matters (such as mapping of EMISA members in the various working groups, preparation of participant lists, meeting badges, meeting minutes, and arrangements for accommodation and travel);
- Communication (enabling networking and communication among members of the same working groups and within EMISA members)
- monitoring purposes (participation in EMISA activities);
- short-listing of nominees (the processing of data serves the informed decision of the responsible decision-makers regarding the effective participation in a certain activity);
- security purposes.

Additionally, the following data processing might take place:

³ For more information on the processing of personal data in EU-Survey, please refer to <https://ec.europa.eu/eusurvey/home/privacystatement>

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- Residential activities

The contact data of co-chairs and participants involved in residential meetings might be shared with other subjects involved in the same activity in order to enable networking activities and cooperation. The data might also be shared with guest speakers, CEPOL external experts/ staff members and European or International Organisations involved as observers in the respective working groups, in order to ensure the logistical and administrative preparation, implementation, follow-up of activities.

The data processing will take place on a need-to-know basis and following prior consent by the data subjects. Personal data shall be shared with other participants upon consent given by the data subject.

- Online activities

User generated data, as well as contact data might be used by CEPOL for administrative purposes, namely the recording and documentation of online activities, as well as for monitoring purposes. This data is accessible by CEPOL staff members and may be accessible to the online platform in which the activity takes place and other participants in the same activity (if applicable).

Regarding the processing of personal data for activities to be organized in the LEEEd Platform, please consult “Privacy Statement for processing personal data on LEEEd (including the LEEEd mobile application)” available at: <https://www.cepola.europa.eu/data-protection>.

Observers to the EMISA Network

In the case of observers to the EMISA network, the processing of data enables CEPOL to identify suitable members from international organisations to participate in the activities of EMISA. The processing of data of observers, serves most of the logistical and security purposes mentioned above with regard to the processing of data of co-chairs and participants (with the exception of travel bookings, which shall be the responsibility of the respective observers and/or their organisations).

Who are the recipients of the data being processed?

- Dedicated CEPOL staff members, including staff handling administrative matters and travel arrangements, as well as the horizontal structure of the International Cooperation Unit for monitoring, evaluating and reporting purposes,
- External contractors booking travel and accommodation services for CEPOL (in relation to data contained in the Travel Request form),
- Other international organisations, EU institutions, agencies and bodies that have a working arrangement with CEPOL and that are involved in the EMISA network,
- EU bodies (upon request): 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.

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Third countries or International organizations

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.

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, and in case the processing is carried out by automated means, data subjects have the right to receive their personal data in a structured, commonly used and machine-readable format.

Data processing may be carried out during and only for the purposes of ensuring the successful delivery of each respective activity/set of activities and on the basis of consent of the data subjects. Data will be transferred to counterparties in third countries on the basis of consent of the data subjects. There will be no automated decision making or profiling upon their data.

Data subjects can request the exercise their rights to the Data Controller or DPO.

Substantiated requests should be emailed to 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. The data Controller shall notify the data subject once the blocking/erasing of the data has been completed.

General requests can be emailed to the CEPOL Data Protection Officer at DPO@cepol.europa.eu. Data subjects have the right to lodge a complaint to the EDPS.

How long is your data retained by CEPOL?

Personal data is stored for a maximum of 3 years after the conclusion of the relevant project, however it is possible that certain data may be kept longer for historical, statistical, and auditing purposes. The identification data of the National Exchange coordinators remains for the whole period someone acts as a NEC.

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Records referring to financial information as well as supporting documents pertaining to payments will be kept for a maximum of 5 years in line with the Financial Regulation.

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 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, in this case the Head of International Cooperation Unit, via 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 to lodge a complaint with the EDPS, as provided for by Article 63 of Regulation (EU) 2018/1725.