

(To be filled out in the EDPS' office)

REGISTER NUMBER: 1209

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NOTIFICATION FOR PRIOR CHECKING

DATE OF SUBMISSION: 17/12/2013

CASE NUMBER: 2013-1394

INSTITUTION: CEPOL

LEGAL BASIS: ARTICLE 27-5 OF THE REGULATION CE N° 45/2001⁽¹⁾

INFORMATION TO BE GIVEN²

1/ NAME AND ADDRESS OF THE CONTROLLER

██████████ Head of Training Unit
European Police College (CEPOL)
Bramshill, Hook
Hampshire RG27 OJW
United Kingdom

2/ ORGANISATIONAL PARTS OF THE INSTITUTION OR BODY ENTRUSTED WITH THE PROCESSING OF PERSONAL DATA

Training Unit

3/ NAME OF THE PROCESSING

Processing of grant applications to organise CEPOL courses and seminars (residential activities)

4/ PURPOSE OR PURPOSES OF THE PROCESSING

The Agency awards grants only to the Framework Partners (usually national police training institutions). Private bodies are not subject to the CEPOL Grant Agreement Management process.

¹ OJ L 8, 12.01.2001.

² **Please attach all necessary backup documents**

The data received is not used for any further purpose than the one for which they were transmitted.

5/ DESCRIPTION OF THE CATEGORY OR CATEGORIES OF DATA SUBJECTS

Representatives of the CEPOL Framework Partners involved in the preparation and implementation of grant applications / agreements

Members of the Evaluation Committee (exclusively from CEPOL, Europol and European Commission).

6/ DESCRIPTION OF THE DATA OR CATEGORIES OF DATA (*including, if applicable, special categories of data (Article 10) and/or origin of data*).

- Applicants: Title, first name and family name, position in the applicant organisation
- Evaluation Committee members: name

No special categories of data are collected.

7/ INFORMATION TO BE GIVEN TO DATA SUBJECTS

The data subjects are provided with the following information in a privacy statement:

- identity of the controller
- purpose of the processing
- data categories
- whether replies to the question are obligatory or voluntary, as well as possible consequences of failure to reply
- possible data recipients
- existence of all data subjects' rights
- right to have recourse to the EDPS
- legal basis of the processing
- applicable data retention periods

The data provided does not undergo automated processing.

8/ PROCEDURES TO GRANT RIGHTS OF DATA SUBJECTS

(Rights of access, to rectify, to block, to erase, to object)

The data subjects have the right to obtain without constraint from the Data Controller, communication in an intelligible form of the data undergoing processing and any available information as to their source.

Data subjects are not requested to specify the purpose of their request for access. Access to the aggregated evaluation results is granted, but not the access to scores and opinions of individual members of the evaluation committee.

The data subject has a right to rectify inaccurate or incomplete data but it is limited to the objective factual data. The applicants nevertheless have the possibility to complement the existing evaluation data by means of the respective review procedures.

Substantiated requests should be e-mailed to the Data Controller at grants@cepol.europa.eu .

General requests can be e-mailed to the CEPOL Data Protection Officer at dpo@cepol.europa.eu

Data subjects may have recourse at any time to the European Data Protection Supervisor at edps@edps.europa.eu

9/ AUTOMATED / MANUAL PROCESSING OPERATION

The processing operations are manual.

10/ STORAGE MEDIA OF DATA

The data are stored in hard copies in locked file cabinets in the Corporate Service Department (Procurement function) and in electronic form in the dedicated drive O folders accessible to the staff involved the grant management process only (via access control).

11/ LEGAL BASIS AND LAWFULNESS OF THE PROCESSING OPERATION

Article 5(a) of Regulation (EC) No 45/2011 (the need to protect the vital interests of the data subjects)

12/ THE RECIPIENTS OR CATEGORIES OF RECIPIENT TO WHOM THE DATA MIGHT BE DISCLOSED

- Relevant CEPOL staff involved in the grant management process
- Members of the Grant Evaluation Committee (CEPOL, Europol, European Commission)
- Internal Audit Service, European Court of Auditors, OLAF and any other institution or body competent in the fields of auditing or investigation (upon request)

13/ RETENTION POLICY OF (CATEGORIES OF) PERSONAL DATA

Processing begins on the date of receipt of the document containing personal data, In general, the absolute maximum during which data is kept in this context is **7 years**.

Specific data retention periods are as follows:

- Successful applicants and the Evaluation Committee members: 7 years after the signature of the respective grant agreement
- Unsuccessful applicants: 5 years after the end of the particular procedure to allow for all possible appeals

13 A/ TIME LIMIT TO BLOCK/ERASE ON JUSTIFIED LEGITIMATE REQUEST FROM THE DATA SUBJECTS

Time limit to block/erase on justified legitimate requests from the data subjects is 15 working days starting from the date of receipt of such request.

14/ HISTORICAL, STATISTICAL OR SCIENTIFIC PURPOSES

If you store data for longer periods than mentioned above, please specify, if applicable, why the data must be kept under a form which permits identification.

Data is not stored for longer periods than mentioned above for historical, statistical or scientific purposes.

15/ PROPOSED TRANSFERS OF DATA TO THIRD COUNTRIES OR INTERNATIONAL ORGANISATIONS

Data is not transferred to third countries or international organisations.

16/ THE PROCESSING OPERATION PRESENTS SPECIFIC RISK WHICH JUSTIFIES PRIOR CHECKING (*Please describe*):

as foreseen in:

Article 27.2.(a)

Processing of data relating to health and to suspected offences, offences, criminal convictions or security measures,

Article 27.2.(b)

Processing operations intended to evaluate personal aspects relating to the data subject,

Article 27.2.(c)

Processing operations allowing linkages not provided for pursuant to national or Community legislation between data processed for different purposes,

Article 27.2.(d)

Processing operations for the purpose of excluding individuals from a right, benefit or contract,

Other (general concept in Article 27.1)

17/ COMMENTS

The Grant Agreement Management process description PR.GRAG.001-1 is currently under review for effectiveness.

The applicable Governing Board Decision 30/2006/GB on organising courses and seminars (residential activities) is currently under review for personal data protection.

PLACE AND DATE: BRAMSHILL, UK, 13/09/2013

DATA PROTECTION OFFICER: [REDACTED]

INSTITUTION OR BODY: EUROPEAN POLICE COLLEGE (CEPOL)