





PRIVACY STATEMENT ON MEETINGS, TRAININGS AND WORKSHOPS ORGANISED BY THE EUROPEAN INSTITUTE OF INNOVATION AND TECHNOLOGY AND THE EU AGENCY FOR LAW ENFORCEMENT TRAINING WITHIN THEIR MANDATE OF PRESIDING THE EU AGENCIES NETWORK AND SUB-NETWORKING GROUPS

This privacy statement provides information on the processing of personal data carried out by the European Institute of Innovation and Technology (EIT) and the EU Agency for Law Enforcement Training (CEPOL) within the framework of their joint mandate of presiding the EU Agencies Network (EUAN), when organising meetings, trainings and workshops.

The EIT and CEPOL are co-chairing the EUAN from March 2024 to March 2025. As part of this mandate, the EIT and CEPOL host meetings and organise training sessions or workshops for the EUAN: the Assembly of the Heads of Agencies, the Heads of Resources, the Heads of HR as well as for its various sub-networking groups.

The processing of personal data follows the provisions of Regulation (EU) 2018/1725¹ 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 (hereinafter "Regulation").

What is personal data and what is a personal data processing operation?

Personal data shall mean any information relating to an identified or identifiable natural person ('data subject'). An identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Processing means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automatic means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Who are the data subjects?

The data subjects are participants to meetings, workshops and trainings (further referred as 'meetings'), speakers and other persons whose personal data appears in the meetings' material e.g. in correspondence, or in presentations displayed in the meetings and/or shared with the participants.

Who is the controller of the data processing?

The data controllers are the Head of Corporate Unit at CEPOL and the Director of the EIT.

¹ OJ L 295, 21.11.2018, p. 39–98





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What is the purpose of the personal data processing?

The purpose of collecting and processing personal data is to coordinate, organise and manage the meetings, including, but not limited to:

- Management of contact lists and registration forms to grant visitors access to the premises of the EIT and CEPOL and/or to the premises where the meetings take place;
- Management of registration forms and/or lists of participants to online meetings to ensure their participation;
- Distribution of presentations and documents circulated during and after the sessions;
- Management of feedback surveys;
- Live web-streaming of speakers and participants in the context of the meeting;
- Collection of information on dietary requirements to provide meals at offline meetings.

Surveys might be done via the EUSurvey tool.

The data processing operations include the collection, recording, organisation, storage, consultation, use, disclosure by transmission, erasure and destruction of personal data.

What types of personal data are processed?

The only personal data collected and further processed is the information the data subjects provide in connection with their participation to the meeting. The following types of personal data are processed for the above-mentioned purposes in accordance with the Regulation:

- Title;
- Name;
- Professional contact details of the participants (e-mail address, telephone number(s) direct and mobile, employer's name and address);
- Professional contact details of the speakers (e-mail address, telephone number(s)- direct and mobile, employer's name and address);
- Dietary requirements.
- Personal data contained in CEPOL's and EIT's articles, including photos, group picture and videos illustrating them may be published in all CEPOL's and EIT's internal and external communication channels (e.g. websites, social media, and publications).
- Recording of (live) web-streaming of speakers and participants.

The meeting may be recorded for the purpose of drafting minutes and for sharing the recording with the participants, including those who were not able to attend in real time. The recordings will be kept only as long as needed for those purposes. If the meeting is recorded, the data subjects shall be informed beforehand, and their explicit consent shall be sought.

As regards photos, group picture and videos, in case they will be used on the EIT's and CEPOL's websites, social media platforms (e.g., Facebook, Twitter, Instagram, LinkedIn, Youtube) and will become publicly available, explicit consent shall also be sought from the data subject.

Who has access to the personal data of data subjects and to whom can they be disclosed?









Within CEPOL/EIT:

The personal data of the participants is jointly processed by the CEPOL and EIT authorised staff responsible for the coordination, organisation and management of the meetings, depending on the sub-networking group:

- EUAN Director's meetings: EIT Directorate staff;
- Heads of Resources: CEPOL (Head of CSU); EIT Directorate Staff;
- Heads of HR: CEPOL (Head of HR);
- Inter-Agency Legal Network (IALN): EIT Legal Section staff;
- Information and Communications Technologies Advisory Committee (ICTAC): EIT IT staff;
- Head of Communication and Information Network (HCIN): Staff from EIT's Communication and Engagement Unit;
- Performance development network (PND): EIT Directorate staff;
- Network for Agencies Procurement Officers (NAPO): EIT Directorate staff;
- Inter-Agency Accountants' Network (IAAN): CEPOL (Accountant); EIT Administration unit staff;
- Greening Network (GN): Staff from EIT's Sustainability Committee;
- EU-ANSA: CEPOL (Head of CSU);
- Social and Sports Tournaments: Staff from EIT's Staff Committee; CEPOL (Head of CSU);

Not depending on the sub-networking group, the authorised staff may have access to personal data in the following cases:

- EIT's and CEPOL's ICT Officers responsible for Microsoft Teams, if necessary for technical support;
- EIT's and CEPOL's Administration/Finance Units, for processing payments and/or reimbursements;
- EIT's and CEPOL's personnel responsible for promoting the events externally may have access to photos, which may be used on the EIT's and CEPOL's websites, social media platforms (e.g., Facebook, Twitter, Instagram, LinkedIn, Youtube) and will become publicly available.

Access will be given to the Internal Auditor of the EIT by request if necessary for the performance of the duties of the Internal Auditor.

Within the Commission and other EU institutions/bodies/agencies:

Staff of the EUAN Shared Support Office may have access to your personal data.

Authorised EIOPA staff responsible for the coordination, organisation and management of the meetings while chairing the following sub-networking groups - Network for Agencies Procurement Officers (NAPO), Performance development network (PND)- may have access to your personal data.

Participants to a meeting, including those not able to attend in real time, speakers and all the EUAN and Sub-Networking Group members have access to personal data visible in invitation to a meeting, on MS Teams, Webex and in presentations.

The authorized staff that may have access to relevant personal data for audit control or investigation purposes: Court of Auditors, Internal Audit Service of the European Commission, European Anti-Fraud Office (OLAF).







Access to the personal data may be granted also to the European Ombudsman and the European Data Protection Supervisor upon request, the General Court and the European Court of Justice to the extent necessary for handling the review procedure and litigation.

Third parties subject to the GDPR² and third parties not subject to the GDPR:

In order to perform the tasks referred to in Section 'What is the purpose of the personal data processing', EIT resorts to external providers (Processors):

- MS Teams (<u>http://privacy.microsoft.com</u>)
- EU Survey (<u>https://ec.europa.eu/eusurvey/home/privacystatement</u>)
- CANCOM (Cisco Webex) (https://www.cisco.com/c/en/us/about/legal/privacy-full.html)

For the purpose of organisation of offline meetings (catering, social event), the EIT may grant access to the personal data of data subjects to an external service provider: ICF Next S.A. (<u>https://www.icf.com/legal/privacy-statement</u>).

As Controllers EIT and CEPOL ensure that the Processors apply the necessary safeguards to process your data safely and in accordance with the Regulation (EU) 2018/1725.

No personal data is shared with third parties for direct marketing purposes.

How long do we keep your data?

Pursuant to the EIT Specific Retention List, the EIT will keep files relating to the participation and organisation of events and stakeholder engagements (reports and documents regarding the meetings) for a period of <u>7</u> years after the meeting. Files including speakers' presentations, photos and videos of the event are kept for a period of <u>5 years</u> after the meeting. Retention period for CEPOL is 5 years.

What are the rights of the data subject?

In accordance with Articles 15, 17, 18, 19 of the Data Protection Regulation of European Institutions the data subjects have the **right for information**, the **right of access**, the **right of rectification** in case their personal data is not complete or not accurate and the **right to erasure** ("right to be forgotten").

The data subjects have the right to obtain the **erasure** of their personal data in accordance with Article 19 of the Regulation and in particular in the cases when the personal data are no longer necessary in relation to the purposes for which they were collected, if the data subject withdraws its consent, or in case of unlawful processing.

Data subjects have also the **right to restriction** of processing of personal data in accordance with Article 20 of the Regulation, and the **right to object** on grounds listed in Article 23 of the Regulation.

² Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation, OJ L 119, 4.5.2016, p. 1–88)







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The rights can be only exercised by sending a request in a written form to <u>EUAN-Coordination@cepol.europa.eu</u> or <u>agenciescoordination@eit.europa.eu</u>. As a general rule, the requests for information, access, rectification, erasure, restriction are handled without undue delay and in any event within one month of receipt of the request; this period may be extended by further two months where necessary, taking into account the complexity and number of requests. In case the data subject contests the accuracy of the data, upon request, the data is restricted immediately for the period of verification of the accuracy of the data, not exceeding on month.

Restrictions to the rights of data subjects may be applied by the EIT, in accordance with Article 25 of the Data Protection Regulation of the European institutions and the EIT internal rules on restrictions³.

Who should be contacted in case of queries or complaints?

You have the right of recourse at any time to the EIT's Data Protection Officer (<u>EIT-DPO@eit.europa.eu</u>) and CEPOL's Data Protection Officer (<u>DPO@cepol.europa.eu</u>) and to the European Data Protection Supervisor (<u>EDPS@edps.europa.eu</u>) or contact the site: <u>https://edps.europa.eu/</u>

Legal basis of the processing operation

- 2024-2025 Work Programme of the EU Agencies Network;
- Sub networking groups 2024-2025 Work Programmes
- Regulation (EU) 2015/2219 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/JHA⁴
- Regulation (EU) 2021/819 of the European Parliament and of the Council of 20 May 2021 on the European Institute of Innovation and Technology (recast)⁵
- Decision 42/2023 of the EIT Governing Board On the Adoption of the Final Single Programming Document (2024-2026) of the EIT⁶

Grounds for lawfulness

In line with Article 5 (1) (a) of Regulation No. (EU) 2018/1725, the processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the EIT and CEPOL. As parts of the EU Agencies Network, EIT and CEPOL will lead the EUAN – composed of 49 Agencies, Joint Undertakings and Bodies – with the goal of raising the visibility and profile of the EU Agencies as trustworthy

³ <u>https://eit.europa.eu/who-we-are/legal-framework/data-protection</u>

⁴ OJ L 319, 4.12.2015, p. 1–20

⁵ OJ L 189, 28.5.2021, p. 61–90

⁶ Ares(2023)8668848; <u>https://eit.europa.eu/library/gb-decision-422023-adoption-final-single-programming-document-2024-2026-eit</u>







partners towards the EU institutions, delivering key tasks to citizens while being placed on the ground across the Member States.

Furthermore, in case of recording of a meeting, the processing is also lawful based on Article 5 (1) (d) of Regulation No. (EU) 2018/1725 as it is based on the consent of the data subject.