# EUPOL COPPS Privacy Statement

## FOR THE PURPOSE OF

### PROCESSING PERSONAL DATA RELATED TO EVENTS AND MEETINGS ORGANISED BY THE EU MISSION FOR THE SUPPORT OF PALESTINIAN POLICE AND RULE OF LAW (EUPOL COPPS)

## 1. INTRODUCTION

The protection of your privacy, including your personal data, is of great importance to the European Union and to EUPOL COPPS. When processing personal data we reflect the provisions of the Charter of Fundamental Rights of the European Union, and in particular its Article 8. This privacy statement describes how EUPOL COPPS processes your personal data for the purpose it has been collected and what rights you have as a data subject.

Your personal data is collected, processed, and stored by EUPOL COPPS in accordance with the principles and provisions laid down in the applicable legislation on data protection, including the 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; aligned with the provisions of the 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 (General Data Protection Regulation); and in accordance with the Civilian Operations Commander’s Instruction 12-2018 as well as with EUPOL COPPS’ standard operating procedures (SOP) on the protection of personal data.

All data of a personal nature - namely data that can identify you directly or indirectly - will be handled fairly and lawfully with the necessary care.

## 2. PURPOSE OF THE PROCESSING OPERATION

The purpose of the data processing activity is to ensure proper organisation and management of events and meetings related to implementation of the Mission’s mandate in order to disseminate information among participants and to the public, enhance cooperation, networking and facilitate exchange fora. It is also intended to allow further contacts with participants.

“Events and meetings” include in-house and external workshops, conferences, seminars, expert meetings, trainings, visits (including study visits abroad) and other events or meetings organised by EUPOL COPPS and related to the implementation of the Mission’s mandate.

The organisation of “events and meetings” includes management of contact and mailings lists for invitations, handling of participation requests and feedbacks, preparation and distribution of preparatory materials, meeting reports, news items and publications as well as handling travel and accommodation arrangements and entries to premises with access control.

## 3. DATA PROCESSED

The personal data which may be processed for that purpose are the following:

1. For “events and meetings”:
   
   - Identification and contact information, including name, position / title, profession, function / organization, email address, phone number, gender;
   - Information about transport and accommodation if foreseen: banking details for the purpose of reimbursement of travel expenses / allowances together with supporting documents (e.g. tickets).
2. For “events and meetings abroad”, in addition to the previous:

- photo, issuing and expiring dates, document number, its issuing / expiration dates, date and place of birth, nationality (copy of passport);
- copy of travelling tickets, hotel reservation, boarding passes.

3. In addition, data are also collected during the event and processed for informing the public and promoting EUPOL COPPS in communications and publications:

- photos, audio and video filming and web streaming of speakers, participants or organisers as well as feedback, surveys, reports and other information about the event;
- biographies and CVs if applicable.

Security of data

Among others, the following measures are taken:

- Electronic format: the data will be stored on the servers that abide by the pertinent security rules. Personal data will be processed by assigned staff members. Files have authorised access. Measures are provided to prevent non-responsible entities from access, alteration, deletion and disclosure of data. General access to all collected personal data and all related information is only possible to the recipients with a User ID/Password.
- Physical Files: When not in use, physical copies of the collected personal data will be stored in a properly secured and locked storage container.

Technical and organisational measures are also guaranteed in order to:

- prevent any unauthorised person from gaining access to computer systems; any unauthorised reading, copying, alteration or removal of storage media; any unauthorised memory inputs; any unauthorised disclosure, alteration or erasure of stored personal data; unauthorised persons from using data-processing systems by means of data transmission facilities;
- ensure that authorised users of a data-processing system can access no personal data other than those to which their access right refers; the possibility to check logs; and that personal data being processed on behalf of third parties can be processed only on instruction of the controller; furthermore that, during communication or transport of personal data, the data cannot be read, copied or erased without authorisation;
- record which personal data have been communicated, at what times and to whom.

4. CONTROLLER OF THE PROCESSING OPERATION

The Controller determining the purpose and the means of the processing operation is EUPOL COPPS. All sections of the Mission, including the Police Advisory Section, Rule of Law Section, Mission Support Department, the Planning and Reporting Unit and Gender and Human Rights Advisers within the Head of Mission Office are responsible for managing the personal data processing operation which are under the supervision of the Head of Mission.

5. RECIPIENTS OF THE DATA

1. The recipients of your personal data (defined under point 3. DATA PROCESSED, paragraphs 1 and 2), and only if the data is necessary in order to fulfil the task (strictly need-to-know basis), may be:

- Designated organising staff of EUPOL COPPS or other assigned EUPOL COPPS team members;
- EUPOL COPPS Joint Security and Duty of Care Department staff;
- External partners, contractors and service providers for the event;
- Event participants, including speakers, interpreters and technical staff if applicable;
• EUPOL COPPS staff at Finance Unit and Human Resources Unit;
• EUPOL COPPS Planning and Reporting Unit staff managing the database of participants in events organised by the Mission;
• External travel agency.

2. The recipients of your personal data (defined under point 3. DATA PROCESSED, paragraph 3) may be:

• EUPOL COPPS share drive’s users (if data published on EUPOL COPPS’s share drive);
• General public (if data is made public on the internet, EUPOL COPPS website or social media platforms).

Upon request personal data is given for the purpose of internal ex-post financial control, for internal or external auditing and for disciplinary investigations (as per the provisions of the Code of Conduct and Discipline). In duly justified cases investigating EU institutions may be given access, including the European Anti-Fraud Office or Member States’ authorities upon authorisation of the Head of Mission or Senior Mission Security Officer.

The given information will not be communicated to third parties or transferred to a Third Country, except where necessary for the purposes outlined above.

6. PROVISION, ACCESS AND RECTIFICATION OF THE DATA

You have the right to access your personal data and the right to correct any inaccurate or incomplete personal data, as well as to request the removal of your personal data, if collected unlawfully, which will be implemented within 10 working days after your request will have been deemed legitimate. If you have any queries concerning the processing of your personal data, you may address them to the functional mailbox: data-protection@eupolcopps.eu.

7. LEGAL BASIS FOR THE PROCESSING OPERATION

Legal basis:

• COUNCIL JOINT ACTION 2005/797/CFSP of 14 November 2005 and its subsequent amendments;
• EUPOL COPPS operational plan (OPLAN) endorsed by Political and Security Committee (PSC);
• Civilian Operations Commander Instruction 12/2018 on the SOP on Personal Data Protection;
• EUPOL COPPS SOP on Personal Data Protection.

Processing of personal data related to events and meetings organized by EUPOL COPPS is necessary for the performance of tasks implementing the Mission’s mandate.

8. TIME LIMIT FOR STORING DATA

Our aim is to keep your personal data not longer than necessary for the purposes we collect them. After the event or meeting, your personal data is kept as long as follow-up actions to the event/meeting are required.

Documents provided for EUPOL COPPS Finance Unit and Human Resources Unit are stored and deleted according to the relevant regulations of those EUPOL COPPS activities.

Personal data may be kept for information and historical, statistical or scientific purposes for a longer period including the publication on the EUPOL COPPS website with appropriate safeguard in place.

9. DATA PROTECTION CONTACT: MISSION DATA PROTECTION ADVISOR

In case you have questions related to the protection of your personal data, you can also contact the Mission Data Protection Advisor (MDPA) at the functional mailbox of the mission data-protection@eupolcopps.eu.
10. **RE COURSE**

You have at any time the right of recourse that you may send to the Head of the Mission within EUPOL COPPS, with the MDPA (Legal Advisor) in copy.