



EUROJUST

The European Union's Judicial Cooperation Unit
P.O. Box 16183 – 2500 BD The Hague • The Netherlands



Network for investigation and
prosecution of genocide, crimes
against humanity and war crimes

DATA PROTECTION NOTICE

For processing of personal data in the context of Genocide Network Secretariat

1. Context and Controller

As Eurojust collects and further processes personal data, it is subject to [Regulation \(EU\) 2018/1725 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](#).

Collection and processing of personal data within Genocide Network Secretariat are under the responsibility of the Controller, who is to the Head of the Genocide Network Secretariat (GNS) and can be contacted at genocidenetworksecretariat@Eurojust.europa.eu.

2. What personal information do we collect, for what purpose, under which legal bases and through which technical means?

Legal basis

The legal basis for the lawfulness of processing personal data is Article 5 (1) (d), of [Regulation \(EC\) 2018/1725](#) of 23 October 2018, whereby the data subject has unambiguously given his or her consent to provide the data necessary for:

- i. the list of Contact Points of the Network in respect of persons responsible for genocide, crimes against humanity and war crimes
- ii. credential purposes to provide them with access to the Genocide Network Restricted Area, a web platform with practical and legal information on core international crimes
- iii. NGO Atlas for information purposes that provides a practical description of activities undertaken by the listed NGOs, as well as their contact details useful to national authorities (EU Member States and Genocide Network Observers) investigating core international crimes.

Purpose of the processing

The purpose of processing the personal data is to maintain and update: (i) the NGO Atlas as well as contact details of partner NGOs, and (ii) the list of Contact Points appointed by the competent national authorities, to enable the sharing of ideas, good practices and exchange information concerning investigation and prosecution of genocide, crimes against humanity and war crimes.

In addition, the Genocide Network Secretariat provides the possibility to access Restricted Area (GN RA) - a web platform that serves also as an access point to the Network to find practical and legal information on core international crimes. Personal data is stored in the RA for credential purposes.

Different sets of data are stored in RA:

- a) personal data of practitioners who have access to RA in order to exchange views and experiences, and to access documents and tools developed by the GNS,



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b) list of *Contact Points* of European network in respect of persons responsible for genocide, crimes against humanity and war crimes (the list is issued as a Council document "limited") for informative purposes,

c) NGO Atlas which is compiling information about Civil Society Organisations/NGOs currently pursuing accountability for core international crimes committed in Ukraine and provides a practical description of activities undertaken by the listed NGOs, as well as their contact details with the following objectives:

- i. Establish contact and build an overview of main NGOs pursuing accountability for core international crimes allegedly committed in Ukraine and their various activities;
- ii. Provide useful contact points to national authorities (EU Member States and Genocide Network Observers) investigating such crimes.

Technical means

GNS collect personal data concerning the:

- i. Contact Points, sent via email by the national authorities.
- ii. Email sent by practitioners requesting access to GN Restricted Area.
- iii. NGO Atlas, contact details sent via email under GNS request.

The data is stored in Eurojust secure ICT environment with restricted access to post holders of GNS on the need to know basis.

Upon termination of the account of the RA, substitution of a Contact Point in the contact points list or NGO Atlas, the original emails requesting the access to RA or nominating a Contact Point are deleted.

Types of personal data

The following of your personal data are collected: name, position, postal address, professional e-mail address, phone number, Fax, IP address, website data, geolocation, and browser-generated information, cookies or other technologies used to track users' activity. These elements are necessary for the Contact Points list, NGO Atlas and the establishment of a web account and for delivering the services requested (such as the membership of Genocide Network Restricted Area).

3. Who has access to your personal data and to whom is it disclosed?

For the purpose detailed above, access to your personal data is given to the following persons:

Only the staff member appointed by the Head of the Secretariat as Document Management Officer (DMO) has access to these data and uses them for example to reset login credentials (as requested).

The Contact Points and NGOs personal data is for informative purposes i.e. to be contacted by other practitioners from their respective countries or other countries regarding core international crimes queries. The Contact Points of the Network and NGOs consent to their personal data being listed in NGO Atlas and Contact Points list in the RA through the official nomination from national authorities and *Terms and Conditions* form.

The NGO Atlas is meant as a living document, to be completed and updated by the Genocide Network Secretariat on an ongoing basis. It has been compiled for information purposes only. The NGO Atlas is not meant as a public document and will be shared with national authorities and Eurojust.



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The list of Contact Points is shared with the General Secretariat of the Council and published according to the Council policy and Article 1 and 2 of the [Council Decision 2002/494/JHA of 13 June 2002](#) setting up a European network of contact points in respect of persons responsible for genocide, crimes against humanity and war crimes, stating: *“Each Member State shall notify the General Secretariat of the Council in writing of its contact point within the meaning of this Decision. The General Secretariat shall ensure that this notification is passed on to the Member States, and inform the Member States of any changes in these notifications.”*

4. How do we protect and safeguard your information?

The access to the RA is provided based on the request from a practitioner accompanied by the GN Restricted Area Terms and Conditions form. The accreditation process is managed by the GNS in cooperation with national authorities, Contact Points and ICT Security office. An authorized staff member of the GNS cross-checks the information provided by the practitioner with Contact Points and national authorities. Once the accreditation is completed and validated, the GNS together with User Support issues credentials to access the RA. The access is password protected. Passwords expire after 90 days. After expiration of the password, the user needs to request the new password at the GNS (this procedure might need to be reviewed in the future).

There is a procedure in place to proactively contact practitioners who have obtained access to the RA in the past but are no longer using their account. A staff member of the GNS works together with User Support to obtain data on inactive RA user accounts and will subsequently contact those users, requesting them to indicate whether they still need RA access and informing them that otherwise their account will be removed. Any disabled or inactive accounts, accounts that were announced as unnecessary, or accounts from users that do not respond within 14 days, will be removed. This activity will take place in the first quarter of each year. Data in the RA is also removed on the same basis.

The information is electronically archived in the Data Management System of Eurojust, a secured network. All IT tools at Eurojust are developed according to a standard set of security and are thoroughly tested accordingly, to ensure robustness and reliability.

5. How can you verify, modify or delete your information?

In case you wish to verify which personal data is stored on your behalf by the Controller, have it modified, corrected, or deleted, or restrict the processing, or object to it or to exercise the right to data portability, please make use of the following email address:

genocidenetworksecretariat@eurojust.europa.eu

6. How long do we keep your personal data?

Personal data and contact details are retained until the GNS is informed of updates or changes.

- i. Contact Points list is regularly reviewed (once per year). As soon as GNS is notified about the changes of the position of a person, the data in the list are updated, or if no longer necessary, deleted.
- ii. In the Restricted Area, the user's activities, including username, IP address and use of the Membership, will be logged purely for administrative and security purposes and retained electronically for a maximum period of one (1) year;



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- iii. The NGO Atlas will be regularly reviewed (once per year at a minimum). As soon as GNS is notified about the changes of the position of a person, the data in the list will be updated, or if no longer necessary, deleted.

7. Contact information

You have the right to access, rectify or erase or restrict the processing of your personal data or, where applicable, the right to object to processing or the right to data portability in line with Regulation (EU) 2018/1725.

Any such request should be directed to the Controller, by using the following email address: genocidenetworksecretariat@eurojust.europa.eu.

You may also contact the Data Protection Officer of the Eurojust at: dpo@eurojust.europa.eu.

8. Recourse

Finally, you have the right of recourse to the [European Data Protection Supervisor \(EDPS\)](https://edps.europa.eu) via email: edps@edps.europa.eu or following the link: https://edps.europa.eu/data-protection/our-role-supervisor/complaints_en.