



The protection of personal data is one of the priorities of the Council of Europe. The Council of Europe is currently engaged in an important exercise aimed at revising legal instruments which form part of the protective framework intended to provide safeguards for European citizens. One of the key areas where the Council of Europe is up-dating its legal framework aims at achieving the right balance between privacy and the legitimate, proportional use of personal data for police purposes. This questionnaire is an important tool which member states are very strongly encouraged to complete in order to provide the basis for evidence-based policy decisions during the near future.

*This document is part of research carried out on behalf of the Consultative Committee of the Convention for the protection of individuals with regard to the automatic processing of personal data (T-PD) facilitated by the Secretariat of the T-PD within the Division for information Society, Media and Data Protection, Directorate General of Human Rights and Legal Affairs of the Council of Europe.*

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This research is also carried out by supported by:

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## Processing of Personal Data in the Criminal Justice sector – Questionnaire

This study is designed to trace the historical development, and current status, of different legislation regulating the use of personal data in the police and criminal justice sector in the Member States of the Council of Europe. The main aim is to assess the extent to which Recommendation R(87)15 aiming for the regulation of the use of personal data in the police sector of the Council of Europe has been implemented across Europe.

Answering this questionnaire is not compulsory. However, your input into this process will greatly assist the Council of Europe, the European Commission, academic researchers and policy makers in obtaining a clearer picture of the current status of data protection in the police sector. Your response will be completely confidential unless you tick the box below which indicates that you agree to be cited or named in an individual capacity.<sup>1</sup>

I agree that my name and affiliation may be cited in outputs of the Study including reports and publications. ☐

In order to assist you in your response, at the end of every question, the Principle of the Recommendation<sup>2</sup> being referred to and, if appropriate, the relevant paragraph of the Explanatory Memorandum, are indicated in brackets.

**Please attach to this questionnaire the original version, as well as a translation in English or in French, of the relevant laws of your country.**

**When answering the questions please include a precise reference, using Article and page number, to the text that you attach and preferably you may wish to cut and paste the relevant sections in to the space provided.**

Note: If you can't answer a question, please move on to the next one.

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<sup>1</sup> For the purposes of the Data Protection Act 1998 of the United Kingdom and the Data Protection Act 2001 of Malta, this data will be retained in a secure, confidential format by the Directorate General of Human Rights and Legal Affairs of the Council of Europe, as well as by Professor Joseph A. Cannataci and Dr Mireille M. Caruana who will be identified as controllers of the files in terms of the respective laws.

<sup>2</sup> <https://wcd.coe.int/wcd/com.instranet.InstraServlet?command=com.instranet.CmdBlobGet&InstranetImage=608011&SecMode=1&DocId=694270&Usage=2>

## Respondent's Information

Last name: [Click here to enter text.](#) First name: [Click here to enter text.](#)

Email address: [Click here to enter text.](#)

Tel no: [Click here to enter text.](#)

Responding Institution: [Click here to enter text.](#)

Address: [Click here to enter text.](#)

Position held within institution: [Click here to enter text.](#)

Date:

## Part 1 – Overview

## Implementing law & section

Q.1 Which pieces of legislation, or other regulatory measures, govern the use of personal data by police and/or security agencies in your country? Please provide the title of the legislation/measure, its reference number, date of enactment and the date it came into effect.	
<a href="#">Click here to enter text.</a>	<a href="#">Click here to enter text.</a>
Q.2 [For Schengen countries] Following the Treaty of Amsterdam of 1997 your country agreed to implement, partially or wholly, <sup>3</sup> CoE Recommendation R(87)15 on Regulating the Use of Personal Data in the Police Sector. What is the title of the Act or other regulatory measure that ensures that your country is in compliance with this part of the <i>acquis communautaire</i> ? Please provide the title of the legislation/measure, its reference number, date of enactment and the date it came into effect.	
<a href="#">Click here to enter text.</a>	<a href="#">Click here to enter text.</a>
Q.3 [For non-Schengen countries] As a non-Schengen state, implementation of that part of the <i>acquis communautaire</i> which includes Recommendation R(87)15 is not obligatory on your country. Has your country however, directly or indirectly, passed an Act or other regulatory measure that implements Recommendation R(87)15? If so, please describe the title of any legislation/measure, its reference number, date of enactment and the date it came into effect.	
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<sup>3</sup> There is some debate as to the interpretation of the Schengen Agreement, especially in so far as participating states may be expected to implement Recommendation R87(15) *in toto* or only to specific instances of police use of personal data.

Q.4 How does the law of your country define personal data “for police purposes”? (R(87)15 ‘Scope and definitions’; Explanatory Memorandum para. 22)	
<a href="#">Click here to enter text.</a>	<a href="#">Click here to enter text.</a>

Q.5 Who in your country is the “responsible body” (authority, service or other public body) which is competent under national law to decide on the purpose of an automated file, the categories of personal data which must be stored and the operations which are to be applied to them (i.e. the controller of the police files)? (R(87)15 ‘Scope and definitions’; Explanatory Memorandum para. 25)	
<a href="#">Click here to enter text.</a>	<a href="#">Click here to enter text.</a>

Q.6 Has your country extended the principles contained in Recommendation R(87)15 to personal data undergoing manual processing? (R(87)15 ‘Scope and definitions’; Explanatory Memorandum para. 26–27)	
<a href="#">Click here to enter text.</a>	<a href="#">Click here to enter text.</a>
Q.7 If not, what, if any, manual processing of data is likely to take, place? What is the aim of such processing? (R(87)15 ‘Scope and definitions’; Explanatory Memorandum para. 26–27)	
<a href="#">Click here to enter text.</a>	<a href="#">Click here to enter text.</a>

Q.8 Has your country extended the principles contained in Recommendation R(87)15 to data relating to groups of persons, associations, foundations, companies, corporations or any other body consisting directly or indirectly of individuals, whether or not such bodies possess legal personality? (R(87)15 ‘Scope and definitions’; Explanatory Memorandum para. 28)	
<a href="#">Click here to enter text.</a>	<a href="#">Click here to enter text.</a>

Q.9 Has your country extended any of the principles of R(87)15 to the collection, storage and use of personal data for purposes of state security? (R(87)15 ‘Scope and definitions’; Explanatory Memorandum para. 29)	
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**Basic Principles**  
**Principle 1 – Control and notification**

Q.10 Principle 1.1: What is the name of the independent supervisory authority outside the police sector responsible for ensuring respect for the principles contained in Recommendation R(87)15? (R(87)15 Principle 1.1; Explanatory Memorandum para. 31–33)	
Click here to enter text.	Click here to enter text.

Q.11 Principle 1.2: Is a privacy/data protection impact assessment undertaken when new technical means for data processing are introduced, to ensure that their use complies with the spirit of existing data protection legislation? (R87(15) Principle 1.2; Explanatory Memorandum para. 34)	
Choose an item.  Comment: Click here to enter text.	Click here to enter text.
Q.12 If a privacy/data protection impact assessment is not undertaken, what other reasonable measures are taken to ensure compliance? (R87(15) Principle 1.2; Explanatory Memorandum para. 34)	
Click here to enter text.	Click here to enter text.

Q.13 Principle 1.3: Is the “responsible body” obliged to consult the supervisory authority in advance in any case where the introduction of automated processing methods raises questions about the application of R(87)15? (R87(15) Principle 1.3; Explanatory Memorandum para. 35)	
Choose an item.  Comment: Click here to enter text.	Click here to enter text.
Q.14 If the consultation is not legally obliged, is it such considered to be a mandatory practice? (R87(15) Principle 1.3; Explanatory Memorandum para. 35)	
Click here to enter text.	Click here to enter text.

Q.15 Principle 1.4: Is there an obligation in your country to notify permanent automated police files to the supervisory authority? (R87(15) Principle 1.4 first sub-paragraph; Explanatory Memorandum para. 36–38)	
Choose an item.  Comment: Click here to enter text.	Click here to enter text.
Q.16 If yes, what should the notification specify? (R87(15) Principle 1.4 first sub-paragraph; Explanatory Memorandum para. 36–38)	
Click here to enter text.	Click here to enter text.

Q.17 Is there an obligation in your country to notify manual police files to the supervisory authority and, if so, what should the notification specify? (R87(15) Principle 1.4 first sub-paragraph; Explanatory Memorandum para. 38–39)	
Choose an item.  Comment: <a href="#">Click here to enter text.</a>	<a href="#">Click here to enter text.</a>
Q.18 If the answer to Q.17 is No, has a general description been drawn up at central level to which manual police files are required to conform? (R87(15) Principle 1.4 first sub-paragraph; Explanatory Memorandum para. 38–39)	
<a href="#">Click here to enter text.</a>	<a href="#">Click here to enter text.</a>
Q.19 If a police force does not comply with this general description, would it be obliged to make its own description and to notify it to the supervisory authority? (R87(15) Principle 1.4 first sub-paragraph; Explanatory Memorandum para. 38–39)	
Choose an item.	<a href="#">Click here to enter text.</a>
Q.20 Are the principles laid down in R(87)15 extended to manual police files in any other ways? (R87(15) Principle 1.4 first sub-paragraph; Explanatory Memorandum para. 38–39)	
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Q.21 Principle 1.4: Is there any obligation in your country to notify <i>ad hoc</i> police files which have been set up at the time of particular inquiries? (R87(15) Principle 1.4 second sub-paragraph; Explanatory Memorandum para. 40–42)	
Choose an item.  Comment: <a href="#">Click here to enter text.</a>	<a href="#">Click here to enter text.</a>
Q.22 If the answer to Q 21. was Yes, under what conditions/national legislation is this done? (R87(15) Principle 1.4 second sub-paragraph; Explanatory Memorandum para. 40–42)	
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## Principle 2 – Collection of data

Q.23 Principle 2.1: Are there instances of collection of personal data for police purposes for purposes others than the prevention of a real danger or the suppression of a specific criminal offence? (R87(15) Principle 2.1; Explanatory Memorandum para. 43)	
Choose an item.  Comment: <a href="#">Click here to enter text.</a>	<a href="#">Click here to enter text.</a>
Q.24 If the answer to Q 23. was Yes, is such collection the subject of specific national legislation clearly authorising wider police powers to gather information? (R87(15) Principle 2.1; Explanatory Memorandum para. 43)	
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Q.25 Principle 2.2: According to existing records, on how many occasions have data subjects been informed where data concerning them have been collected and stored without their knowledge and have not been deleted as soon as the object of the police activities was no longer likely to be prejudiced? (R87(15) Principle 2.2; Explanatory Memorandum para. 44–45)	
<a href="#">Click here to enter text.</a>	<a href="#">Click here to enter text.</a>

Q.26 Principle 2.3: Which laws/specific provisions provide for collection of data by technical surveillance or other automated means? Please provide the title of the legislation/measure, its reference number, date of enactment and the date it came into effect. (R87(15) Principle 2.3; Explanatory Memorandum para. 46–47)	
<a href="#">Click here to enter text.</a>	<a href="#">Click here to enter text.</a>
Q.27 Are those laws/specific provisions accompanied by adequate guarantees against abuse? If yes, please provide examples of such guarantees. (R87(15) Principle 2.3; Explanatory Memorandum para. 46–47)	
Choose an item.  <a href="#">Click here to enter text.</a>	<a href="#">Click here to enter text.</a>

Q.28 Principle 2.4: Does the law of your country prohibit the collection of data on individuals solely on the basis that they have a particular racial origin, particular religious convictions, sexual behaviour or political opinions or belong to particular movements or organisations which are not proscribed by law, unless absolutely necessary for the purposes of a particular inquiry? (R87(15) Principle 2.4; Explanatory Memorandum para. 48)	
<a href="#">Click here to enter text.</a>	<a href="#">Click here to enter text.</a>
Q.29 According to existing records, on how many occasions has data on individuals been collected solely on the basis that they have a particular racial origin, particular religious convictions, sexual behaviour or political opinions or belong to particular movements or organisations which are not proscribed by law? (R87(15) Principle 2.4; Explanatory Memorandum para. 48)	
<a href="#">Click here to enter text.</a>	
Q.30 How was/is the question of “absolute necessity for the purposes of a particular inquiry” determined? (R87(15) Principle 2.4; Explanatory Memorandum para. 48)	
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### Principle 3 – Storage of data

Q.31 Principle 3.1: What measures are in place to ensure that, as far as possible, the storage of personal data for police purposes is limited to accurate data and to data necessary to allow police bodies to perform their lawful tasks within the framework of national law and their obligations arising from international law? (R87(15) Principle 3.1; Explanatory Memorandum para. 49–51)	
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Q.32 Principle 3.2: The Explanatory Memorandum refers to ‘a system of data classification’. In your country, are different categories of data stored by police authorities distinguished in accordance with their degree of accuracy or reliability? (R87(15) Principle 3.2; Explanatory Memorandum para. 52)	
<a href="#">Click here to enter text.</a>	<a href="#">Click here to enter text.</a>
Q.33 In particular, do the police authorities of your country distinguish data based on facts from data based on opinions or personal assessments? (R87(15) Principle 3.2; Explanatory Memorandum para. 52)	
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Q.34 Principle 3.3: Do the police authorities of your country store data which has been collected for administrative purposes (for example, information on firearms certificates granted, lost property, etc) and are to be stored permanently, in a separate file? (R87(15) Principle 3.3; Explanatory Memorandum para. 53–54)	
<a href="#">Click here to enter text.</a>	<a href="#">Click here to enter text.</a>
Q.35 Is such administrative data also subject to the special regime for police data? (R87(15) Principle 3.3; Explanatory Memorandum para. 53–54)	
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### Principle 4 – Use of data by the police (statement of the notion of finality)

Q.35 Principle 4: Are there instances in which personal data collected and stored by the police for police purposes (the prevention and suppression of criminal offences or the maintenance of public order) are used for other purposes? (R87(15) Principle 4; Explanatory Memorandum para. 55)	
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## Principle 5 – Communication of data

Q.36 Principle 5.1: In what circumstances is the communication between police bodies of data to be used for police purposes permissible? (R87(15) Principle 5.1; Explanatory Memorandum para. 56)	
Click here to enter text.	Click here to enter text.
Q.37 Does it require the police authorities to have a “legitimate interest” in obtaining the data? (R87(15) Principle 5.1; Explanatory Memorandum para. 57)	
Choose an item.  Click here to enter text.	Click here to enter text.
Q.38 If it is required that the receiving police authority possess a “legitimate interest” in obtaining the data, how is such a “legitimate interest” for such communication to be determined? (R87(15) Principle 5.1; Explanatory Memorandum para. 57)	
Click here to enter text.	Click here to enter text.
Q.39 Is any oversight mechanism in place? (R87(15) Principle 5.1; Explanatory Memorandum para. 57)	
Choose an item.  Click here to enter text.	Click here to enter text.
Q.40 Principle 5.2: In what circumstances is the communication of police data to other public bodies (e.g. social security authorities, inland revenue authorities, immigration control, customs authorities etc.) permissible? (R87(15) Principle 5.2.i; Explanatory Memorandum para. 58–61)	
Click here to enter text.	Click here to enter text.
Q.41 Are there instances in your law of a clear legal obligation on the police authorities to communicate data to any other public bodies? (R87(15) Principle 5.2.i.a; Explanatory Memorandum para. 60)	
Click here to enter text.	Click here to enter text.
Q.42 Are there instances in which the supervisory authority may authorise such a communication of data by the police authorities to any other public bodies? (R87(15) Principle 5.2.i.a; Explanatory Memorandum para. 60)	
Click here to enter text.	Click here to enter text.
Q.43 Is any other authority empowered to authorise the police authorities to communicate data to any other public bodies? (R87(15) Principle 5.2.i.a; Explanatory Memorandum para. 60)	
Click here to enter text.	Click here to enter text.

Q.44 Are there any other circumstances in which the police authorities of your country are authorised to communicate data to other public bodies (apart from when there exists a clear legal obligation or authorisation)? (R87(15) Principle 5.2.i.b and 5.2.ii; Explanatory Memorandum para. 61–62)	
<a href="#">Click here to enter text.</a>	<a href="#">Click here to enter text.</a>
Q.45 Are there any provisos to this authority being granted? (R87(15) Principle 5.2.i.b and 5.2.ii; Explanatory Memorandum para. 61–62)	
<a href="#">Click here to enter text.</a>	<a href="#">Click here to enter text.</a>
Q.46 Is any oversight mechanism in place with regard to determinations of authorisation to communicate data to other public bodies? (R87(15) Principle 5.2.i.b and 5.2.ii; Explanatory Memorandum para. 61–62)	
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Q.47 According to existing records, on how many occasions has communication to other public bodies been exceptionally permitted, in a particular case?	
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Q.48 Principle 5.3: In what circumstances is the communication of police data to private parties permissible? (R87(15) Principle 5.3; Explanatory Memorandum para. 58, 63–64)	
<a href="#">Click here to enter text.</a>	<a href="#">Click here to enter text.</a>

Q.49 Are there instances in your law of a clear legal obligation on the police authorities to communicate data to any private parties (R87(15) Principle 5.3; Explanatory Memorandum para. 63–64)	
<a href="#">Click here to enter text.</a>	<a href="#">Click here to enter text.</a>
Q.50 Are there instances in which the supervisory authority may authorise such a communication of data by the police authorities to any private parties? (R87(15) Principle 5.3; Explanatory Memorandum para. 63–64)	
<a href="#">Click here to enter text.</a>	<a href="#">Click here to enter text.</a>
Q.51 Is any other authority empowered to authorise the police authorities to communicate data to a private party? (R87(15) Principle 5.3; Explanatory Memorandum para. 63–64)	
<a href="#">Click here to enter text.</a>	<a href="#">Click here to enter text.</a>

Q.52 Are there any other circumstances in which the police authorities of your country are authorised to communicate data to private parties (apart from when there exists a clear legal obligation or authorisation)? (R87(15) Principle 5.3; Explanatory Memorandum para. 63–64)	
<a href="#">Click here to enter text.</a>	

Q.53 According to existing records, on how many occasions has communication to private parties been exceptionally permitted, in a particular case?	
<a href="#">Click here to enter text.</a>	

  

Q.54 Principle 5.4: Is communication of data to foreign authorities restricted to police bodies? (R87(15) Principle 5.4; Explanatory Memorandum para. 65–69)	
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Q.55 Is there clear legal provision under national or international law enabling the communication of data by your police authority to foreign authorities? (R87(15) Principle 5.4.a; Explanatory Memorandum para. 65–69)	
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Q.56 In the absence of such a provision, in what other circumstances may your police authorities communicate data to foreign authorities? (R87(15) Principle 5.4.b; Explanatory Memorandum para. 65–69)	
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Q.57 Is any oversight mechanism in place with regard to determinations of circumstances warranting the communication of data to foreign authorities? (R87(15) Principle 5.4; Explanatory Memorandum para. 65–69)	
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Q.58 According to existing records, on how many occasions have your police authorities communicated data to foreign authorities in the absence of a clear legal provision under national or international law permitting such communication? (R87(15) Principle 5.4; Explanatory Memorandum para. 65–69)	
<a href="#">Click here to enter text.</a>	

Q.59 What circumstances justified such a communication? (R87(15) Principle 5.4; Explanatory Memorandum para. 65–69)	
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Q.60 Principle 5.5.i: What information does your country require to be included when requests for communication of data are made to the police authorities? (R87(15) Principle 5.5.i; Explanatory Memorandum para. 70–72)	
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Q.61 In particular, is it a requirement that requests for communication of data be justified, i.e. that they include the reason for the request and its objective? (R87(15) Principle 5.5.i; Explanatory Memorandum para. 70–72)	
Choose an item.	<a href="#">Click here to enter text.</a>
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Q.62 Are there any specific provisions contained in national legislation or in international agreements applicable to your country in regard to requests for communication of data? (R87(15) Principle 5.5.i; Explanatory Memorandum para. 70–72)	
<a href="#">Click here to enter text.</a>	<a href="#">Click here to enter text.</a>

Q.63 Principle 5.5.ii: Do your police authorities have structures in place whereby, at the latest at the time of their communication, the quality of data is verified? (R87(15) Principle 5.5.ii; Explanatory Memorandum para. 73–75)	
<a href="#">Click here to enter text.</a>	<a href="#">Click here to enter text.</a>
Q.64 Do your police authorities have structures in place whereby, in all communications of data, judicial decisions, as well as decisions not to prosecute, are indicated and data based on opinions or personal assessments checked at source before being communicated? (R87(15) Principle 5.5.ii; Explanatory Memorandum para. 73–75)	
Choose an item.  <a href="#">Click here to enter text.</a>	<a href="#">Click here to enter text.</a>

Q.65 What strategy does the law require when data which are no longer accurate or up to date are to be, or have been, communicated? (R87(15) Principle 5.5.ii; Explanatory Memorandum para. 73–75)	
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Q.66 Principle 5.5.iii: Are any safeguards in place to ensure that data communicated to other public bodies, private parties and foreign authorities are not used for purposes other than those specified in the request for communication? (R87(15) Principle 5.5.iii; Explanatory Memorandum para. 76–77)	
<a href="#">Click here to enter text.</a>	

Q.67 According to existing records, have requests ever been made by other public bodies, private parties or foreign police authorities to use the communicated data for purposes other than those specified in the request for communication?	
<a href="#">Click here to enter text.</a>	
Q.68 If yes, to how many of those requests has the communicating police body acceded?	
<a href="#">Click here to enter text.</a>	

Q.69 Principle 5.6: Is there any clear legal provision in the laws of your country that authorises any interconnection of police files with files held for different purposes (for e.g. social security bodies, passenger lists kept by airlines, trade union membership files, etc.)? (R87(15) Principle 5.6; Explanatory Memorandum para. 78–79)	
Click here to enter text.	Click here to enter text.
Q.70 If so, does the clear legal provision state the conditions under which interlinkage can take place? (R87(15) Principle 5.6; Explanatory Memorandum para. 78–79)	
Click here to enter text.	Click here to enter text.
Q.71 May the supervisory body grant authorisation for the interconnection of files with files held for different purposes, and if so, is such authorisation limited to particular purposes? (R87(15) Principle 5.6; Explanatory Memorandum para. 78–79)	
Click here to enter text.	Click here to enter text.

Q.72 According to existing records, on how many occasions and in what instances has the interconnection of files with files held for different purposes been authorised by the supervisory body?	
Click here to enter text.	
Q.73 What limited purposes, if any, was this authorisation granted for?	
Click here to enter text.	

Q.74 How many of your police systems are accessible on-line even if in a secure fashion? (R87(15) Principle 5.6; Explanatory Memorandum para. 80)	
Click here to enter text.	
Q.75 Does the domestic legislation of your country allow direct access or online access to a file? If yes, does it provide specific safeguards in those cases where direct access or online access to a file is permitted? (R87(15) Principle 5.6; Explanatory Memorandum para. 80)	
Choose an item.  Click here to enter text.	Click here to enter text.

## Principle 6 – Publicity, right of access to police files, right of rectification and right of appeal

Q.76 Principle 6.1: Does the supervisory authority of your country take any measures so as to satisfy itself that the public is informed of the existence of police files, as well as of the rights of individuals in regard to these files (the requirement of publicity)? (R87(15) Principle 6.1; Explanatory Memorandum para. 81–82)	
Click here to enter text.	Click here to enter text.
Q.77 In what manner does implementation of the requirement of publicity take account of the specific nature of <i>ad hoc</i> files, in particular the need to avoid	

serious prejudice to the performance of a legal task of the police bodies? (R87(15) Principle 6.1; Explanatory Memorandum para. 81–82)	
<a href="#">Click here to enter text.</a>	

Q.78 Principle 6.2: What arrangements does your country provide for the data subject to be able to obtain access to a police file at reasonable intervals and without excessive delay? (R87(15) Principle 6.2; Explanatory Memorandum para. 83–84)	
<a href="#">Click here to enter text.</a>	<a href="#">Click here to enter text.</a>
Q.79 Does your country operate a system of registration of requests for access to data? (R87(15) Principle 6.2; Explanatory Memorandum para. 84)	
<a href="#">Choose an item.</a>	
Q.80 If the answer to Q.79 is Yes, is the register of requests kept separate from the normal criminal files held by the police, and is data deleted from the register after the lapse of a period of time? (R87(15) Principle 6.2; Explanatory Memorandum para. 84)	
<a href="#">Click here to enter text.</a>	<a href="#">Click here to enter text.</a>

Q.81 Principle 6.3: What is required of the data subject for her to be able to obtain, where appropriate, rectification or erasure of her data which are contained in a file? (R87(15) Principle 6.3; Explanatory Memorandum para. 85–86)	
<a href="#">Click here to enter text.</a>	<a href="#">Click here to enter text.</a>

Q.82 According to existing records, how many data subject requests for rectification or erasure of data contained in a police file have been received by the police authorities? <a href="#">Click here to enter text.</a>	
Q.83 According to existing records, on how many occasions were data found to be excessive, inaccurate or irrelevant in application of any of the principles contained in R(87)15? <a href="#">Click here to enter text.</a>	
Q.84 What action, if any, was taken or is planned to be taken pursuant to these findings? <a href="#">Click here to enter text.</a>	
Q.85 Within what time-frame was such action taken or is expected to be taken? <a href="#">Click here to enter text.</a>	

Q.86 Principle 6.4: In what instances have the rights of access, and thus the rights of rectification and erasure, been refused? Please give examples. (R87(15) Principle 6.4; Explanatory Memorandum para. 87–90)	
<a href="#">Click here to enter text.</a>	<a href="#">Click here to enter text.</a>

Q.87 Principle 6.5: Does the law of your country oblige the police authority to provide the data subject with a reasoned restriction or refusal of the exercise of the data subject's rights to access, rectification or erasure of her data? How are such reasons communicated to the data subject? (R87(15) Principle 6.5; Explanatory Memorandum para. 91)	
<a href="#">Click here to enter text.</a>	<a href="#">Click here to enter text.</a>
Q.88 In what circumstances may the police refuse to communicate the reasons for a restriction or refusal of the data subject's rights to access, rectification or erasure of data? (R87(15) Principle 6.5; Explanatory Memorandum para. 92)	
<a href="#">Click here to enter text.</a>	
Q.89 In either case, is the data subject given information on how to challenge the decision? (R87(15) Principle 6.6; Explanatory Memorandum para. 92)	
<a href="#">Click here to enter text.</a>	

Q.90 In what sort of real case scenarios has the exercise of such rights been restricted or refused?	
<a href="#">Click here to enter text.</a>	

Q.100 Does the law provide for a right of appeal to the supervisory authority or to another independent body (for e.g. a court or tribunal) from a refusal to grant access? (R87(15) Principle 6.6; Explanatory Memorandum para. 92–95)	
<a href="#">Click here to enter text.</a>	<a href="#">Click here to enter text.</a>
Q.101 Is the supervisory authority or other independent body obliged to communicate the data to the individual if there is no justification for refusing access? If not, what alternative action could it take? (R87(15) Principle 6.6; Explanatory Memorandum para. 92–95)	
<a href="#">Click here to enter text.</a>	<a href="#">Click here to enter text.</a>
Q.102 According to existing records, on how many occasions has a denied access request been challenged before the supervisory authority or other independent body?	
<a href="#">Click here to enter text.</a>	
Q.103 On how many occasions has the supervisory authority or other independent body decided that there was no justification for refusing access, and what action did it take?	
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## Principle 7 – Length of storage and updating of data

Q.104 Principle 7.1: What measures are taken so that personal data kept for police purposes are deleted if they are no longer necessary for the purposes for which they were stored? (R87(15) Principle 7.1; Explanatory Memorandum para. 96)	
Click here to enter text.	Click here to enter text.

Q.105 Principle 7.2: Has your country established rules aimed at fixing storage (or conservation) periods for the different categories of personal data collected and stored for police purposes? (R87(15) Principle 7.2; Explanatory Memorandum para. 97–99)	
Click here to enter text.	Click here to enter text.
Q.106 Who or which authority was responsible for formulating the rules. Please describe the content and application of the said rules. Kindly provide a reference to the rules. (R87(15) Principle 7.2; Explanatory Memorandum para. 98)	
Click here to enter text.	Click here to enter text.

Q.107 Has your country established rules aimed at regular checks on the quality of personal data collected and stored for police purposes? (R87(15) Principle 7.2; Explanatory Memorandum para. 98)	
Click here to enter text.	Click here to enter text.
Q.108 Who or which authority was responsible for formulating the rules. Please describe the content and application of the said rules. Kindly provide a reference and attach the relevant text. (R87(15) Principle 7.2; Explanatory Memorandum para. 98)	
Click here to enter text.	Click here to enter text.

## Principle 8 – Data security

Q.109 Has the “responsible body” (i.e. the controller of the police files) taken all the necessary measures to ensure the appropriate physical and logical security of the personal data collected and stored for police purposes, and to prevent unauthorised access, communication or alteration thereto? (R87(15) Principle 8; Explanatory Memorandum para. 100)	
Click here to enter text.	Click here to enter text.
Q.110 For these purposes, have the different characteristics and contents of files containing personal data collected and stored for police purposes been taken into account? (R87(15) Principle 8; Explanatory Memorandum para. 100)	
Click here to enter text.	Click here to enter text.