EXECUTIVE SUMMARY

1. ████████████████ on premise is a solution developed by a private company that allows Europol to retrieve, store, trace and analyse cryptocurrencies. A previous version of the solution has been in use at Europol since 2017.

2. ████████████████ on premise implies processing of non-DSC data. With regard to retrieval and hosting, processing of non-DSC data is due to the fact that the collection and storage of information through ███████████████ on premise is carried out proactively by Europol.

3. The EDPS stresses that Article 18(2)(c) ER cannot be used as legal basis for the retrieval and storage of non-DSC blockchain data.

4. The EDPS notes that the retrieval and storage of non-DSC data through ███████████████ may only be based on Article 18(6a) ER, to the extent that such processing activities align with the purposes and conditions set out in that provision.

5. As indicated above, in order to ensure compliance of the processing with Article 18(6a) ER, the EDPS deems necessary that, Europol:

a) Substantiate the strict necessity and proportionality to perform large-scale retrievals and storage of personal data, including non-DSC data. This entails demonstrating the absence of alternative data processing solutions that could achieve the same operational results guaranteed by ███████████████ on premise, while offering an equal level of data protection against undue disclosure.

b) Limit the retention period of the retrieved blockchain to one week as of the moment of the retrieval.