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**CC:** [REDACTED]  
**Sent at:** 30/04/19 16:20:58  
**Subject:** EDPS ref 2019-0370 D(2019) 830

Dear Madam,

Please find attached a scanned version of a letter sent to you by regular mail today.

Sincerely yours,



**EDPS Secretariat**

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**WOJCIECH RAFAŁ WIEWIÓROWSKI**  
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**30 AVR. 2019**

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**Subject: Own initiative inquiry on Europol's "Big Data Challenge"**

Dear Mrs de Bolle,

I would like to thank you for bringing to us, proactively, on 1 April 2019, the concerns raised by the evolution of the personal data processing activities taking place on the Computer Forensic Network (CFN). This high-level meeting was followed by a staff meeting on 11 April 2019, at EDPS premises, where Europol presented the outcome of the first report of the taskforce created by Europol to give an appropriate answer to such concerns.

On the basis of these discussions, we understand that the CFN is, to date, hosting more than two PB of data and that this environment is not used exclusively for purposes of forensic analysis but it is now used by all Analysis Projects for purposes of operational analysis, next to the Europol Analysis System (EAS). This incremental growth in the volume of data received by Europol is due, according to the discussions held so far, to a change in the nature of the data collected by national law enforcement authorities and further transmitted to Europol. As a way of example, national competent authorities increasingly share with Europol electronic communications data collected in bulk in the context of national investigations. This leads Europol to adapt its business model to meet the challenges of Big Data processing operations.

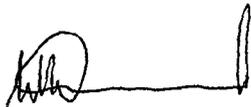
The evolution of Europol's personal data processing activities towards Big Data Analytics raises concerns linked to the compliance with the Europol's data protection framework, in particular with the principles of data minimisation, data accuracy, storage limitation, with the impact of potential data breaches, location of storage, general management, security, etc.

While we fully understand that the use of Big Data Analytics creates new opportunities for law enforcement authorities and for Europol in the fight against serious crime, it also creates significant challenges for the protection of privacy and data protection, in particular with regard to the principle of purpose limitation.

In light of the above, pursuant to Articles 43(2) (b) and (d) of the Europol Regulation<sup>1</sup>, the EDPS has decided to open an own initiative inquiry on the use of Big Data Analytics by Europol for purposes of strategic and operational analysis (case file number 2019-0370).

In the context of our Annual Inspection scheduled for 3-6 June 2019<sup>2</sup>, we intend to inspect the personal data processing activities taking place on the CFN. The findings of these inspection activities will be included in the minutes of the inspection and will feed our inquiry. They might therefore be dealt with separately from the rest of the annual inspection.

Yours sincerely,



Wojciech Rafał WIEWIÓROWSKI

cc: [REDACTED]

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<sup>1</sup> Regulation (EU) 2016/794 of the European Parliament and of the Council of 11 May 2016 on the European Union Agency for Law Enforcement Cooperation (Europol) and replacing and repealing Council Decisions 2009/371/JHA, 2009/934/JHA, 2009/935/JHA, 2009/936/JHA and 2009/968/JHA, OJ L 135, 24.5.2016, p. 53-114.

<sup>2</sup> Case file 2019-0063.