



Education, Audiovisual and Culture Executive Agency

## DATA CONTROLLER

### RECORD OF PERSONAL DATA PROCESSING

Art. 31 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, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/EC (henceforth the "Regulation")

Record n°

05/2019

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*In accordance with Article 31(1) of the new Regulation, individuals whose personal data are processed by the Agency in any context whatsoever are to be protected with regard to the processing of personal data and the Agency has to keep records of their processing operations.*

*This record covers two aspects:*

- 1. Mandatory records under Art 31(1) of the new Regulation (recommendation: make the header and part 1 publicly available)*
- 2. Compliance check and risk screening (initial; part 2 is internal only to the Agency, not published)*

*The ground for the record is (tick the relevant one):*

- Regularization of a data processing operation already carried out*
  - Record of a new data processing operation prior to its implementation*
  - Change of a data processing operation.*
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<b>School Education Gateway</b>	
<b>1</b>	<p><b>Last update of this record (where applicable)</b></p> <p>N/A</p>
<b>2</b>	<p><b>Short description of the processing</b></p> <p>The School Education Gateway is an online platform for school education where anyone can register. Presented in 23 European languages, the School Education Gateway is a single point of entry targeting teachers, school leaders, policy makers, experts and other professionals in the school education field. Personal data are provided by the users themselves by submitting online forms in various areas of the School Education Gateway platform, in order to participate to the activities (such as taking part in the online courses or submit listings) and to be able to use all the features of the platform (such as commenting articles, adding items in favourites, or saving searches).</p> <p>School Education Gateway is an initiative of the European Union. It is funded by Erasmus+, the European programme for Education, Training, Youth and Sport.</p>
<b>Part 1 - Article 31 Record</b>	
<b>3</b>	<p><b>Name and/or function and contact details of controller</b></p> <p>The Education Audiovisual and Culture Executive Agency (EACEA), Avenue du Bourget 1, BE-1049 Brussels</p> <p>Head of Unit A5 – Erasmus+: Schools, Vocational Training, Adult Education, Platforms</p> <p>Email: <a href="mailto:EACEA-EPLUS-ETWINNING@ec.europa.eu">EACEA-EPLUS-ETWINNING@ec.europa.eu</a></p>
<b>4</b>	<p><b>Contact details of DPO</b></p> <p><a href="mailto:EACEA-data-protection@ec.europa.eu">EACEA-data-protection@ec.europa.eu</a></p>
<b>5</b>	<p><b>Name and contact details of joint controller (where applicable)</b></p> <p>To be determined</p>
<b>6</b>	<p><b>Name and contact details of processor (where applicable)</b></p> <p>EUN Partnership aisbl Rue de Trèves, 61 1040 Brussels Belgium</p> <p>Tel: +32 2/790 75 75 Email: <a href="mailto:info@eun.org">info@eun.org</a> Website: <a href="http://www.eun.org">www.eun.org</a></p>
<b>7</b>	<p><b>Purpose(s) of the processing</b></p> <p>EUN Partnership aisbl (hereinafter "European Schoolnet") runs the School Education Gateway platform ("SEG platform") on behalf of the Education, Audiovisual and Culture Executive Agency.</p>

	<p>The processing of data is necessary to:</p> <ul style="list-style-type: none"> <li>• Allow registrants to use platform services such as: <ul style="list-style-type: none"> <li>○ posting comments, reviews and listings;</li> <li>○ using different platform features such as favourites or saved searches; and</li> <li>○ enriching the user profiles.</li> </ul> </li> <li>• Be able to handle helpdesk inquiries, content suggestions, reported items, etc.;</li> <li>• To allow School Education Gateway registrants to communicate and collaborate in the spirit of mutual trust and respect;</li> <li>• Allow and facilitate monitoring and research activities;</li> <li>• Develop outreach and communication purposes within the framework of the School Education Gateway platform and its services;</li> <li>• Send the users updates and relevant information (i.e. newsletter) related to School Education Gateway, and to inform users of other related activities they might be interested in within European Commission initiatives;</li> <li>• Enable online course administration and implementation including: <ul style="list-style-type: none"> <li>○ tracking attendance to training courses, progress and completion of modules by individual users;</li> <li>○ sharing personally identifiable information and performance in a given online course with the instructors or moderators who teach the course or are part of running the course;</li> <li>○ allowing users to contribute to the online courses through rating, comments, bookmarks, tagging, completing quizzes, taking part in forums and other communication tools, and uploading their own resources;</li> <li>○ presenting and summarising outcomes of a course;</li> <li>○ reuse and reference posts in forums and communication tools in ongoing and future versions of the courses and course communications, and to enhance future course offerings;</li> <li>○ organising users into group or themed-based activities.</li> </ul> </li> <li>• Enable and improve the user experience within this and potential similar future projects developed by the European Commission via user access control, tracking usage frequency, search behaviours, preferences and settings;</li> <li>• Allow for collection, categorization and summary of user contributions in the forums and other discussion tools;</li> <li>• Provide aggregated statistics, including, but not limited to, the number of users during a specific period, the preferred subjects and/or countries chosen by members and account usage.</li> </ul>
8	<p><b>Description of the categories of data subjects</b></p> <p><b>Whose personal data are being processed?</b></p> <p><input type="checkbox"/> EA staff (Contractual and temporary staff in active position)</p> <p><input type="checkbox"/> Visitors to the EA</p> <p><input type="checkbox"/> Contractors providing goods or services</p> <p><input type="checkbox"/> Applicants</p> <p><input type="checkbox"/> Relatives of the data subject</p> <p><input type="checkbox"/> Complainants, correspondents and enquirers</p> <p><input type="checkbox"/> Witnesses</p> <p><input type="checkbox"/> Beneficiaries</p> <p><input type="checkbox"/> External experts</p> <p><input type="checkbox"/> Contractors</p>

	<input checked="" type="checkbox"/> Other, please specify: general public, i.e. those individuals who decide to use or register at the School Education Gateway platform.
9	<b>Description of personal data categories</b>
	<p><b>Indicate <u>all</u> the categories of personal data processed:</b></p> <p><b>a) General categories of personal data:</b></p> <p><input type="checkbox"/> in the form of personal identification numbers</p> <p><input checked="" type="checkbox"/> concerning the physical characteristics of persons as well as the image, voice or fingerprints</p> <p>Optional personal information is collected for the member profile and a registrant can decide whether to give that data or not. The optional information entails images.</p> <p><input checked="" type="checkbox"/> concerning the data subject's private sphere</p> <p>Information from forums and other online communication tools: the School Education Gateway may offer public forums (or similar third-party communication tools such as Padlet or Tricider) as part of its online courses. These forums can be on the portal or they can be embedded or linked to from the portal. On the forums the users can share comments, thoughts, photos, videos and other resources.</p> <p>As indicated in the platform, the use of such tools is optional. These tools are managed by third-parties applying their own privacy policies. By registering to them the participants accept that their personal data will be processed by these third parties (as controllers);</p> <p><input type="checkbox"/> concerning pay, allowances and bank accounts</p> <p><input type="checkbox"/> concerning recruitment and contracts</p> <p><input type="checkbox"/> concerning the data subject's family</p> <p><input checked="" type="checkbox"/> concerning the data subject's career</p> <p>We may receive personally identifiable information when information is provided in response to a survey operated by us. If the person participates in an online course, we may collect certain student-generated content, such as assignments submitted, peer-graded assignments and peer grading student feedback. Course data is also collected, such as student responses to quizzes, forum entries and surveys.</p> <p><input type="checkbox"/> concerning leave and absences</p> <p><input type="checkbox"/> concerning missions and journeys</p> <p><input type="checkbox"/> concerning social security and pensions</p> <p><input type="checkbox"/> concerning expenses and medical benefits</p> <p><input type="checkbox"/> concerning telephone numbers and communications</p> <p><input checked="" type="checkbox"/> concerning names and addresses (including email addresses)</p> <p>The personal data collected on the School Education Gateway platform are:</p> <ul style="list-style-type: none"> <li>• First name</li> <li>• Last name</li> </ul>

- Email
- Member type:
  - Company staff
  - Government & policy makers
  - Non-governmental organisation staff
  - Recent graduates / Students
  - Teachers & school staff: pre-school level
  - Teachers & school staff: primary level
  - Teachers & school staff: secondary level
  - Teachers & school staff: special needs
  - School management
  - Higher education institution staff
  - Parent/family
  - Regional and local authorities
  - Other
  - None selected\*\*

(\*\* Since March 2016, is obligatory for users to indicate their user type in their profile on SEG.)

- Country
- Image (non-mandatory)

Furthermore, members can get affiliated to one or several organisations. To create a profile for an organisation, the following data is collected (the items marked with \* are obligatory)

- Organisation name\*
- Address\*
- City\*
- Postal code\*
- Country\*
- Region\*
- Type\*
- Description
- PIC (Participant Identification Code)\*
- Contact person\*
- Website
- Facebook URL
- Twitter URL
- LinkedIn URL
- Image

Other, please specify: \_\_\_\_\_

***b) Categories of personal data processing likely to present specific risks:***

- data relating to suspected offences, offences, criminal convictions or security measures
- data being used to evaluate personal aspects of the data subject (ability, efficiency, conduct)

***c) Categories of personal data whose processing is prohibited, with exceptions (art. 10 new Regulation):***

- revealing racial or ethnic origin
- revealing political opinions
- revealing religious or philosophical beliefs
- revealing trade-union membership

	<input type="checkbox"/> concerning health <input type="checkbox"/> genetic data, biometric data for the purpose of uniquely identifying a natural person <input type="checkbox"/> concerning sex life or sexual orientation  <b>d) Specify any additional data or explanatory information on the data being processed, if any:</b> If sensitive data are submitted by users on the platform (revealing political opinion or religious beliefs) such data will be disregarded by the controller and its data processor.
10	<p><b>Retention time (time limit for keeping the personal data)</b></p> <p><b>Indicate the <u>period of storage</u>:</b></p> <p>Data related to the account and profile of the user are kept for three years after the user's last login. After three years from the last login, the user profile will automatically be set to inactive, i.e., no longer visible to other users. A notification is sent to the user to inform her/him that her/his account has been set to inactive and that he/she can re-activate his/her account by logging in again within two weeks. If the user does not login within two weeks, his/her account and profile will be deactivated permanently. All personal information linked to the user account is then made anonymous. Any personal data the user may have inserted through third-parties tools (e.g. during an online course when using an external online tool, such as Facebook, Twitter or Padlet) is not under the responsibility of the data controller and is therefore not concerned with the anonymization.</p> <p>In case users ask for the deactivation of their account or the account is automatically deactivated, no data will be visible to other School Education Gateway users. Data will be kept only in an anonymous form that does not allow for personal identification. If users with a deactivated account want to continue using the platform, they will need to register again. The data remain solely for research and monitoring purposes at the disposal of the EACEA, the European Commission, national or regional school authorities, authorities in charge of implementing School Education Gateway and other third parties under the authorisation of the data controller in an aggregated format.</p> <p>This period of storage time does not apply to personal data submitted under third-party tools (from optional tools proposed to the participants).</p> <p><b>Is any further processing for historical, statistical or scientific purposes envisaged?</b>  <input type="checkbox"/> yes <input checked="" type="checkbox"/> no</p> <p><b>If yes, indicate the further retention time:</b>  N/A</p>
11	<p><b>Recipients of the data</b></p> <p>For the purposes detailed above, access to the full data is strictly limited to:</p> <ul style="list-style-type: none"> <li>• European Commission, Directorate General Education and Culture (EAC) designated staff</li> <li>• EACEA designated staff</li> <li>• The service provider EUN Partnership designated staff</li> </ul> <p>Some data submitted by users will be displayed on the public area of the School Education Gateway platform, which means that such data is freely accessible on the Internet. In this case the user has the right to delete their data. The data which becomes public is in particular the following:</p>

	<ul style="list-style-type: none"> <li>• <b>Organisation data</b> is visible to all users through the organisation's page: <ul style="list-style-type: none"> <li>○ Name, address, city, country, picture, Facebook URL, Twitter URL, LinkedIn URL and website</li> <li>○ Registrants affiliated to the organisation (first name, last name, country, picture)</li> <li>○ Courses, Mobility Opportunities and Strategic Partnership listings posted by the members of the organisation</li> <li>○ Star rating based on the average score of the organisation's courses (if any)</li> <li>○ List of reviews and ratings submitted by other users on the organisation's courses</li> </ul> </li>   <li>• <b>Registrant data:</b> <ul style="list-style-type: none"> <li>○ The following registrant data is visible to all users only at the public organisation page (if the user is affiliated to one or several organisations): first name, last name, country, a thumbnail of the picture (if provided)</li> <li>○ User's profile page is accessible only to other logged in users, including the following information: first name, last name, country, picture, organisation(s), user type, comments made by the registrant, articles favorited by the member, and if the registrant is eTwinning verified.</li> <li>○ Any listing, comment, review and/or rating voluntarily made by a registered user is public, i.e. visible to the website users when viewing the commented or reviewed item and also retrievable through search engines.</li> <li>○ User activity on the online courses is viewable only by the registered users who have also signed up to the specific online course.</li> </ul> </li> </ul>
12	<p><b>Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards?</b></p> <p>No</p>
13	<p><b>General description of security measures</b></p> <p>The collected personal data and all related information are stored on secured servers of the service provider (European Schoolnet).</p> <p>A contractual clause about data protection is included in the contract with the service provider, to ensure that their data are processed in compliance with the applicable legislation.</p> <p>The operations of the service provider's computer centres contractually abide to the European Commission's security directives and provisions established by the Directorate of Security for these kinds of servers and services.</p>
14	<p><b>Specific Privacy Statement</b></p> <p><a href="https://www.schooleducationgateway.eu/en/pub/disclaimer.htm">https://www.schooleducationgateway.eu/en/pub/disclaimer.htm</a></p>