



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°

004-2020

In accordance with Article 31 of Regulation 2018/1725, 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 of the 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*
- Migration from notification to record.*

HR satisfaction and evaluation surveys (this part may be public)	
1	Last update of this record (where applicable) N/A
2	Short description of the processing Unit R1 carries out evaluation surveys on different topics and actions, using corporate IT tools such as EUSurvey (e.g. job shadowing exercise), EU Learn (for the evaluation of training only) or personal interviews (e.g. "newcomers", "internal mobility", or "exit" interviews). Depending on the case, the surveys address a pre-determined target (e.g. the job shadowing participants) or all Agency's staff (e.g. EACEA reorganisation: call for expression of interest). Depending on the case and the purpose, surveys can be anonymous or not.

	In all cases, the reports based on the surveys and published on the Agency Intranet present only anonymised and aggregated results.
Part 1 - Article 31 Record	
3	<p>Name of the Controller Unit(s) and/or function of person acting on behalf of the Controller</p> <p>Controller: European Education and Culture Executive Agency Unit(s): Unit R1 (People Workplace and Communication) EACEA-HR@ec.europa.eu</p>
4	<p>Contact details of the Data Protection Officer (DPO)</p> <p>EACEA-data-protection@ec.europa.eu</p>
5	<p>Name and contact details of joint controller (where applicable)</p> <p>N/A</p>
6	<p>Name and contact details of processor (where applicable)</p> <p>DG HR – owner and provider of the corporate Learning Management System “EU Learn” HR-EU-LEARN@ec.europa.eu</p> <p>Service Level Agreement concluded between the Agency and the DG HR (Ref. Ares(2018)127508) and its Annex B</p>
7	<p>Purpose of the processing</p> <p>The processing of personal data in the framework of surveys may have the following purposes:</p> <ul style="list-style-type: none"> • Collect and evaluate staff satisfaction and feedback on activities already carried out by the HR sector, check quality and relevance of the activities, adapt the offer of HR services. • Collect staff inputs, ideas, motivation for designing or implementing future actions. • Audit, follow up and reporting. • Statistics.
8	<p>Description of the categories of data subjects</p> <p>Whose personal data are being processed?</p> <p><input checked="" type="checkbox"/> Agency staff</p> <p><input type="checkbox"/> Visitors to the Agency</p> <p><input checked="" type="checkbox"/> Contractors providing goods or services (e.g. surveys on training)</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>

	<input type="checkbox"/> Contractors <input type="checkbox"/> Other, please specify: staff from other DGs and EAs participating in activities co-organize by EACEA
9	<p>Description of personal data categories</p> <p>Indicate <u>all</u> the categories of personal data processed and specify which personal data are being processed for each category (between brackets under/next to each category):</p> <p><i>a) Categories of personal data:</i></p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> in the form of personal identification numbers <u>EU Login</u> <input checked="" type="checkbox"/> concerning the physical characteristics of persons as well as the image, voice or fingerprints <u>gender</u> (if applicable) <input checked="" type="checkbox"/> concerning the data subject's private sphere: <u>name, surname</u> (if applicable) <input type="checkbox"/> concerning pay, allowances and bank accounts <input type="checkbox"/> concerning recruitment and contracts <input type="checkbox"/> concerning the data subject's family <input checked="" type="checkbox"/> concerning the data subject's career: <u>unit, grade, step, seniority in the Agency</u> (if applicable) <input type="checkbox"/> concerning leave and absences <input type="checkbox"/> concerning missions and journeys <input type="checkbox"/> concerning social security and pensions <input type="checkbox"/> concerning expenses and medical benefits <input type="checkbox"/> concerning telephone numbers and communications <input checked="" type="checkbox"/> concerning names and addresses (including email addresses) <u>contact details</u> (if applicable) <input checked="" type="checkbox"/> Other: <u>opinion on the activity, motivation, suggestions, comments</u> (if applicable) <p><i>b) Categories of personal data processing likely to present <u>specific risks</u>:</i></p> <ul style="list-style-type: none"> <input type="checkbox"/> data relating to suspected offences, offences, criminal convictions or security measures <input type="checkbox"/> data being used to evaluate personal aspects of the data subject (ability, efficiency, conduct) <p><i>c) Categories of personal data whose processing is <u>prohibited</u>, with exceptions (art. 10):</i></p> <ul style="list-style-type: none"> <input type="checkbox"/> revealing racial or ethnic origin <input type="checkbox"/> revealing political opinions <input type="checkbox"/> revealing religious or philosophical beliefs <input type="checkbox"/> 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 <p><i>d) Specify any additional data or explanatory information on the data being processed, if any:</i></p>
10	<p>Retention time (time limit for keeping the personal data)</p> <p>The personal data collected and processed within each survey are kept for the time necessary to fulfil the specific purpose of the survey (the retention time is indicated in the specific privacy statement that goes with the survey).</p>

	<p>Information obtained in the course of the individual talks is anonymised and saved in a restricted folder in HR designated drive for up to 2 years. The information collected is included in an annual report which does not contain any personal data which allow direct or indirect identification of the respondent.</p> <p>Is any further processing for historical, statistical or scientific purposes envisaged? <input checked="" type="checkbox"/> yes <input type="checkbox"/> no</p> <p>If yes, indicate the further retention time:</p> <p>Before eliminating the files, HR may prepare anonymised statistics.</p>
11	<p>Recipients of the data</p> <ul style="list-style-type: none"> • EACEA Human Resources Unit, designated staff • EACEA Director • Heads of departments • Heads of unit • European Commission, DG DIGIT- the EU-Survey owner • European Commission, DG HR – EU Learn owner • European Commission, DG DIGIT – EUSurvey owner <p>In addition, in case of control or dispute, personal data can be shared with and processed by the bodies charged with a monitoring or inspection task in application of Union law in compliance with the applicable data protection rules and within the scope of their tasks entrusted by the relevant legislation. This includes, in particular, the following recipients:</p> <ul style="list-style-type: none"> • The European Court of Justice or a national judge as well as the lawyers and the agents of the parties in case of a legal procedure; • The European Anti-Fraud Office (OLAF); • The Internal Audit Service of the Commission • The Investigation and Disciplinary Office of the Commission (IDOC) • The European Court of Auditors • The European Ombudsman • The European Public Prosecutor’s Office • EU courts and national authorities
12	<p>Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards?</p> <p>N/A</p>
13	<p>General description of the technical and organisational security measures</p> <p>The European Commission’s IT systems used by the Agency abide by the Commission's security guidelines. The Agency must comply with Commission Decision (EU, Euratom) 2017/46 of 10 January 2017 on the security of communication and information systems in the European Commission.</p> <p>1. Organisational measures:</p> <p>A Corporate Local Informatics Security Officer (C-LISO) is in place. Its role includes supervising the Agency compliance with the relevant regulations, and the application of security measures recommend by DIGIT.</p> <p>Organisational measures include appropriate access rights and access control. As a rule within the Agency, access to information systems, the file system or offices are subject to a series of authorisations where the person granting the access is different from the person requesting or</p>

	<p>authorising the access - except in limited cases of delegation. The HR responsible person in the unit in charge of this action (processing operation of the current record) collects and places the documents on the secured drives of the Commission and all Agency staff are bound by a confidentiality obligation. The need to know principle applies in all cases.</p> <p>2. Technical measures:</p> <p>State of the art technical cybersecurity measures are implemented in the corporate systems, according to the security needs. Those measures are in constant evolution.</p>
14	<p>Information to data subjects / Privacy Statement</p> <p>When launching a survey or inviting for a personal interview, Unit R1 publishes or provides a staff member with a specific privacy statement that defines the scope, the purpose and the retention time.</p> <p>EUSurvey has its own privacy statement: link. EU Learn has its own privacy statement: link</p>