



## RECORD OF PERSONAL DATA PROCESSING

Record n°

N° 2025-01

*In accordance with Article 31 of Regulation 2018/1725, 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 (hereafter the Regulation), the Agency has to keep records of its processing operations.*

*This record covers two aspects:*

- 1. Mandatory information on the processing (part 1 - publicly available)*
- 2. Compliance check and risk screening (part 2 - internal only to the Agency, not published)*

*The ground for the record is:*

- ☐ 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 under the old regulation to record.

Education for Climate Coalition (E4C)	
1	<b>Last update of this record (where applicable)</b>  N/A
2	<b>Short description of the processing</b>  The Education for Climate Coalition (E4C) is a collaborative initiative engaging the education community across the EU to drive the green transition and sustainable development. As part of the European Education Area, it connects students, teachers, and stakeholders to tackle climate change through cooperation, experience sharing, and concrete pledges.  The E4C is hosted on the European Commission's DIGIT Open Social platform, a third-party solution which is a ready-to-use Drupal Content Management System with standard functionalities to create and manage external network platforms under europa.eu.  EACEA, together with its processors (see below Section 1.6) collects and processes personal data to allow the provision of services for the Education for Climate Coalition initiative.  The E4C website is publicly accessible. Community registration is publicly enabled via the platform

	<p>Personal data is required when the data subjects want to participate in the E4C activities and interact in the platform. To do so, they have to create an EU login account. After this a verification process is applied to give access to them to the platform restricted areas. Data subjects can only add their personal data once registered.</p> <p>Personal data is processed to restrict access or to enable interested individuals to create EU login user accounts and access specific functionalities to upload and download information and content, propose challenges and discussion topics, find members for collaboration, make announcements, post or share news, participate in networking activities or specific groups, participate in discussion forums, subscribe to EC publications, create events, share user experiences and add details to their profiles to find partners for collaboration, mentoring, job &amp; traineeship opportunities, or seeking funding. This is necessary to drive the green transition and sustainable development to tackle efficiently climate change.</p> <p>In that context, personal data is also processed for the following purposes:</p> <ul style="list-style-type: none"> <li>• Recording, adapting, and storing videos (e.g., interviews, testimonials, promotional videos, selfie videos, event videos) and producing user stories and audio files</li> <li>• Communication and promotional activities (e.g., campaign emails, social media, surveys, e-newsletter, reports)</li> <li>• Organizing and attending in-person events (EU/Brussels) and online events, which might be organized in the EEA countries (e.g. community cafes, interviews, testimonials, E4C annual event, workshops)</li> <li>• Research and statistical purposes</li> <li>• Responding to users' technical queries related to the platform</li> <li>• Manage the online communities and groups</li> </ul>
<b>Part 1 – General Information</b>	
3	<p><b>Name of the Controller</b>  <b>Unit(s) and/or function of person acting on behalf of the Controller</b></p> <p>Controller: European Education, and Culture Executive Agency (EACEA)  Avenue du Bourget 1, BE-1049 Brussels  Head of Unit A6   Platforms, Studies and Analysis  <a href="mailto:EACEA-EDUCATION-FOR-CLIMATE@ec.europa.eu">EACEA-EDUCATION-FOR-CLIMATE@ec.europa.eu</a></p>
4	<p><b>Contact details of the Data Protection Officer (DPO)</b></p> <p><a href="mailto:EACEA-data-protection@ec.europa.eu">EACEA-data-protection@ec.europa.eu</a></p>
5	<p><b>Name and contact details of joint controller (where applicable)</b></p> <p>N/A</p>
6	<p><b>Name and contact details of processor (where applicable)</b></p> <p>The following contractors of EACEA act as data processors (as defined in the related Framework Contract, specific contract and EACEA/2024/OP/0001 call for tender specifications).</p> <ol style="list-style-type: none"> <li>1. European Service Network SA (Group Leader of the consortium)  Avenue des Arts 47, 1000 Brussels, Belgium  ESN's Data Protection Contact:  Tel.: +32 (0)477 31 85 96  Tel.: +32 (0)2 307 79 06  E-mail: <a href="mailto:smb@esn.eu">smb@esn.eu</a>; <a href="mailto:dpo@esn.eu">dpo@esn.eu</a></li> <li>2. ECORYS EUROPE EEIG – GEIE (Group member)  Avenue des Arts 46, 1000 Brussels, Belgium</li> </ol>

	<p>Ecorys Europe's Data Protection Officer Contact: E-mail: <a href="mailto:privacy@ecorys.com">privacy@ecorys.com</a></p> <p>The European Commission Directorate-General for informatics (DG DIGIT) acts as processor on the basis of the Service Level Agreement (SLA) signed between DG DIGIT and EACEA to oversee the IT platform maintenance, development and user experience enhancements.</p> <p>The European Commission is also involved as processor for the user of EU Survey platform (<a href="#">EUSurvey - Welcome (europa.eu)</a>), and the EU Academy platform (<a href="#">EU Academy</a>) as well as for the use of TEAMS, WEBEX and SLIDO.</p> <p>The Directorate-General for Communications Networks, Content and Technology (DG CNECT) of the European Commission acts as processor for the use of Newsroom to send newsletters on the basis of the Processor Agreement signed between EACEA and DG CNECT in 2024. Email address: <a href="mailto:CNECT-NEWSROOM-SUPPORT@ec.europa.eu">CNECT-NEWSROOM-SUPPORT@ec.europa.eu</a></p>
7	<p><b>Purpose of the processing</b></p> <p>The purpose of the processing is to support the E4C stakeholders' engagement and facilitate communities' collaboration for an efficient and concrete mobilisation of the educational community via a secured and safe online environment in support of the transition to climate neutrality, particularly in relation to developing green skills and competences, and nurturing agency and change in behaviour. Transition to climate neutrality is one of the key targets of the European Commission.</p> <p>The processing of personal data information is necessary collected to:</p> <ul style="list-style-type: none"> <li>• Set up and manage the members' accounts</li> <li>• Protect the platform against malicious activities</li> <li>• Implement the verification process for newly registered users</li> <li>• Manage cookies and consent management</li> <li>• Keep history of user's operations performed</li> <li>• Assure quality of the online content (e.g., monitoring and validation of publications on the platform)</li> <li>• Allow users to create content</li> <li>• Publish announcements, comments and feedback</li> <li>• Share content, documents, scientific publications and contributions to discussion forums.</li> <li>• Organise and manage online and on-site or hybrid events (including live streaming, videos and recording of events)</li> <li>• Provide specific e-services on the platform, like joining and being invited to communities, groups and conversations, activities/ events, receiving notifications and messages</li> <li>• Inform &amp; communicate with the platform users, community and groups members on existing communities and groups, specific community, groups and network activities,</li> <li>• Ensure platform functionalities and content as well as related activities such as participation to online and onsite events (e.g. E4C annual event, workshops, interviews, testimonials, community cafés, country groups events, etc.), calls for participation, contest, surveys, mentoring groups for motivational purposes, written contributions for input/output like achievements or contributions on the E4C platform by means of newsletters, announcements, notifications, posts, social media, user stories, emails, etc.</li> <li>• Ensure subscription to Newsletter (Newsroom)</li> <li>• Allow interaction and networking among the members of the communities/groups</li> <li>• Identify new user needs and improve the quality/functioning of the platform</li> <li>• Reply user queries</li> <li>• Process authorization and contact forms</li> <li>• Extract aggregated data for research and statistical purposes.</li> </ul> <p>In addition</p> <ul style="list-style-type: none"> <li>• Other optional data, which might be submitted by community and group members on a voluntary basis and at their free choice and may be published on the communities and groups (e.g., messages, challenges and threads, files, videos/webcam recordings and pictures).</li> </ul> <p>The platform has the technical capability to administer and add/remove details of the User Profile to better fulfil the purpose of the network, in full respect of data protection principles (in particular data minimisation).</p>

8	<p><b>Description of the categories of data subjects</b></p> <p>Whose personal data are being processed?</p> <p><input checked="" type="checkbox"/> Agency staff (Contractual and temporary staff in active position)</p> <p><input checked="" type="checkbox"/> Contractors</p> <p><input checked="" type="checkbox"/> Complainants, correspondents and enquirers</p> <p><input checked="" type="checkbox"/> Event participants</p> <p><input checked="" type="checkbox"/> Other, please specify:</p> <p>Members of the platform: every interested person in the field of education, who needs information on the green transition and sustainable development, can register on the platform after validation and use of an EU login. It mostly targets all Erasmus+ Programme (potential) beneficiaries such as: teachers, educators, learners, researchers, policy makers, and other stakeholders (e.g.: schools, universities, non-governmental organizations, local to national administration, and industry).</p>
9	<p><b>Description of personal data categories</b></p> <p><b>a) Categories of personal data:</b></p> <p><input checked="" type="checkbox"/> data subjects' contact details (names, surnames and email addresses)</p> <p>At registration and to request technical support, users must add their first, middle and last name, e-mail address.</p> <p><input checked="" type="checkbox"/> registration data/participation to meeting, etc</p> <p>To register, users must submit their first, last name and e-mail address.</p> <p><input checked="" type="checkbox"/> physical characteristics of persons: image, voice, video recording, etc.</p> <p>E4C registered members may voluntarily submit or share their image and voice during online and hybrid events, in videoconferencing, interviews, audio calls, video recordings and/or podcasts. They may decide to voluntarily share their picture(s) in public or private channels of the platform, e.g., news items, announcements, scientific publications. They may also voluntarily upload their image in their user profile, share their experiences, opinions, pictures and quotes for articles to be published within the platform. This will be implemented in line with a moderation policy to be established.</p> <p>Speakers and participants, who take part in online or physical events may have recordings, live-streaming and photographs of themselves and /or of their presentation taken during the events and upon their consent to be used for promotion on the platform or social media accounts. Data subjects can publish images of any other data subject only with their explicit consent for the promotion of the platform activities on events, on their social media accounts, websites, etc. (Data subjects are reminded to follow the Data Protection Regulation when posting this type of images and collect the relevant consent in due time).</p> <p><input checked="" type="checkbox"/> info concerning the data subject's private sphere and family</p> <p>Optional: At registration, community and groups members may indicate their groups or areas of interest. After registration, registered members may provide, upon their free will, information on their personal motivation to join the communities and groups, and other information that can belong to their private sphere, such as blogs, personal websites, personal social media handles</p> <p>Personal data that community and groups users may disclose upon discussing in communities, groups, mentoring and job board section, interviews or in helpdesk enquiries on a voluntary basis. During events users may interact with third party tools on a voluntary basis. The use of these tools fall under their own privacy policies: this is reminded in the Data Protection Notice.</p> <p><input checked="" type="checkbox"/> allowances and bank accounts</p> <p>Bank account reference (IBAN and BIC codes), VAT number, passport number, ID number.</p> <p><input checked="" type="checkbox"/> info concerning the data subject's career</p>

	<p>At registration, in events, surveys, video and audio recording, interviews, announcements, publications, news, in content published on the platform, members may share their organization, current professional role, field of expertise, curriculum vitae, job position/title, fields of interest.</p> <p><input checked="" type="checkbox"/> data subjects' missions and journeys</p> <p>Participants may take part in E4C onsite events. To be able to be reimbursed for the travel, the accommodation and subsistence costs, information on itineraries and travel receipts need to be collected.</p> <p><input checked="" type="checkbox"/> data subjects' expenses</p> <p><input checked="" type="checkbox"/> data subjects' communications via phone, emails etc.</p> <p>Optional: E-mail addresses of community and group members, as well as institutions/organisations, may be shared by registered members on a voluntary basis with other members on the platform.</p> <p><input checked="" type="checkbox"/> geo/localization, IP address, etc.</p> <p><input checked="" type="checkbox"/> Other: please specify:</p> <ul style="list-style-type: none"> <li>• EU login</li> <li>• Platform generated user ID</li> <li>• Username or account</li> <li>• Password changes</li> <li>• Last authentication and authenticated account activity</li> <li>• Log files, which may include the IP address</li> <li>• Interest</li> <li>• Spoken languages</li> <li>• Country</li> <li>• Nationality</li> <li>• Other data submitted voluntarily during interviews/activities (e.g. opinions, interests, quotes), on EU surveys, MS TEAMS, WEBEX, SLIDO, MIRO, and/or on the platform, by answering questions during interview, asking for assistance for technical problems with the platforms or tick box agreeing data to be used in a publication, etc.</li> </ul> <p><b>b) Categories of personal data processing likely to present <u>specific risks</u>: none</b></p> <p><b>c) Categories of personal data whose processing is <u>prohibited</u>, with exceptions (art. 10):</b></p> <p><input checked="" type="checkbox"/> concerning health: accessibility requirements for physical events and dietary requirements including food allergies for events catering may be processed. The names of people are not shared with the catering vendor.</p> <p><b>d) Specify any additional data or explanatory information on the data being processed, if any: N/A</b></p>
10	<p><b>Retention time (time limit for keeping the personal data)</b></p> <p>The personal data is kept on the platform for the time necessary to fulfil the purpose of collection, namely the authentication of the user on the website and it is kept for as long as the user is active and there is no request made by the user to remove the data from the system. The logs of the platform are kept for 42 days.</p> <p>Registered users to the "E4C" e-services have password protected access to their profile and can, at any moment, update their information, cancel their registration or request to unsubscribe from specific interest groups or communications. Time limits of the retention of data in the EU Login Authentication Service are defined in the privacy statement of the <a href="#">European Commission's Identity &amp; Access Management Service (DPR-EC-03187)</a>. The personal data of the verified community and groups members of the platform is kept up to three years following the last login. In case members request the deactivation of their profile the profile</p>

	<p>is automatically deactivated. Deactivated data will not be visible to other members. Deactivated data will be deleted. If deactivated members want to use the platform again they must register a new as members.</p> <p>The retention period for:</p> <ul style="list-style-type: none"> <li>• Personal data for social media influencers (e.g. first and last name, email address, pictures) that may be shared with EACEA is five years</li> <li>• images, voices and recordings of interviewers, users, community and groups members and event participants (including videos, podcasts and user's stories) is kept as long as the recording/ visual is used on the platform and for maximum five years after the closure of the contract with processors in charge of the platform. Images, voices and recordings based on prior consent, they may be published on the European Commission (EC) -DG EAC website and other public online platforms (e.g. VIMEO or other EC websites, as well as on the social media accounts of the EC and of community and groups members and influencers). Data may be used and archived by the EC in accordance with the applicable <a href="#">data protection record on long time preservation</a></li> <li>• the personal data shared by the platform's members is kept up to three years following the last login. In case members request the deactivation of their profile or the profile is automatically deactivated. Deactivated data will not be visible to other members. Deactivated data will be deleted. If deactivated members want, to use the platform again they must register anew as members</li> <li>• the personal data collected for the participation on events is one year after the event for which it was collected</li> <li>• the personal data shared in requests for information received in mailboxes is two years starting from the answer provided</li> <li>• the voice recording published as podcast in EU Academy and in line with the EU Academy record and privacy statement is three years after the last interaction of the user on the platform <a href="https://academy.europa.eu/admin/tool/policy/view.php?versionid=19&amp;returnurl=https%3A%2F%2Facademy.europa.eu%2F">https://academy.europa.eu/admin/tool/policy/view.php?versionid=19&amp;returnurl=https%3A%2F%2Facademy.europa.eu%2F</a></li> </ul> <p>Data related to statistics and research purposes are kept for the entire duration of the E4C initiative. Five years after the end of the contract (2027 with a possible extension of maximum 2 years), the processors will hand over all information and data to EACEA and will not keep a copy of personal data in any format. The aggregated and anonymous data remain solely for research and monitoring purposes, at the disposal of EACEA, the European Commission (DG DIGI, etc.). Data in aggregated and anonymous format may be kept longer by the contractor(s) ESN, ECORYS and by DG DIGIT under the authorisation of the Data Controller.</p> <p>The retention period of E4C user's personal data shared with DG CNECT (in Newsroom) to register to E4C newsletters is of five years after the last interaction (i.e., subscribing, confirming subscription, update users' profile) of the data subject with Newsroom. Users could erase his/her account or unsubscribe from the mailing list at any time and his/her profile and personal data will be completely erased. This is described in the data protection record No <a href="#">DPR-EC-03928.1</a> and in the Newsroom <a href="#">Data Protection Declaration Wiki page</a>.</p> <p>Personal data in security log files, the IP addresses and other additional data related to a user's interaction with an EC e-service (date and time of authentication, change/reset of password or account status) is stored for a maximum of one year. In the context of investigations of security incidents, the personal data could be further processed following record <a href="#">DPR-EC-02886 DIGIT IT</a> security operations and services, where a different retention period applies.</p> <p>Is any further processing for historical, statistical or scientific purposes envisaged?  <input type="checkbox"/> yes <input checked="" type="checkbox"/> no</p>
11	<p><b>Recipients of the data</b></p> <p>Access to your personal data is provided to the EACEA staff responsible for carrying out this processing operation and to any authorised staff according to the "need to know" principle. Such staff abide by statutory confidentiality obligations.</p> <p>The following recipients may also access to your personal data:</p>



	<ul style="list-style-type: none"> <li>• Authorised staff of the European Commission (such as DG EAC, CNECT, COMM, JRC, DIGIT, INTPA)</li> <li>• Authorised staff of the EACEA contractor(s) acting as processor(s): ESN and ECORYS as contractors that abide by contractual confidentiality requirements. For more information on personal data may be processed by them, see their privacy statements: <a href="https://esn.eu/about/privacy-statement">https://esn.eu/about/privacy-statement</a>, and <a href="https://www.ecorys.com/privacy/">https://www.ecorys.com/privacy/</a>. Please note that only the data mentioned in this data protection record and in line with the conditions stipulated herewith are processed by the contactor(s)</li> <li>• DG DIGIT acting as processor for EACEA and its contractor (MICROSOFT) for the use of TEAMS (see <a href="#">Privacy Statement for M365</a>, under part 7), and its contractor (CISCO) for the use of WEBEX/ web conference service (see <a href="#">Privacy Statement for WEBEX</a> under part 7)</li> <li>• Other participants of events based on consent for sharing participants' list</li> <li>• Registered members, including also for optional data submitted by users (e.g. messages, online discussions and threads, files, videos/webcam recording, images) in communities, groups, events, which may be visible to other registered members</li> <li>• General public for the information being published on the E4C website, and/ or for data published on the EC and EACEA websites, EC corporate platforms and/or on the social media of DG EAC and other DGs and EACEA accounts (X, Facebook, Instagram, LinkedIn, BlueSky, etc.), including VIMEO platform (see <a href="https://vimeo.com/privacy">https://vimeo.com/privacy</a>), which can be accessed by any person in the world using the internet or subscribing to internet notification services. In order to deliver its service, VIMEO will act as separate controller for the processing of personal data on which they determine the means and the purposes and might transfer personal data outside the EU in accordance with their privacy policies.</li> <li>• Users' personal data are accessible within the public area once logged in and if the users have filled in their public profile.</li> </ul> <p>EU Survey (<a href="#">EUSurvey - Welcome (europa.eu)</a>) may be used for the purpose of participating in surveys and consultations, to give consent for the use of image, voice, video recordings, etc in accordance with its privacy policy which can be found here: <a href="https://ec.europa.eu/eusurvey/home/privacystatement.">https://ec.europa.eu/eusurvey/home/privacystatement.</a></p> <p>Whenever possible, data will be processed in an anonymous way, especially if transferred to third parties for research purposes.</p> <p>Personal data will never be used for marketing purposes.</p> <p>In addition, data may be disclosed to public authorities in accordance with Union and Member State law such as the European Court of Justice, the relevant national judge as well as the lawyers and the agents of the parties in case of legal proceedings, the Investigation and Disciplinary Office of the European Commission (IDOC), the competent Appointing Authority in case of a request or a complaint lodged under Articles 90 of the Staff Regulations, the European Anti-Fraud Office (OLAF), the Internal Audit Service of the Commission (IAS), the Court of Auditors, the European Ombudsman, the European Data Protection Supervisor (EDPS) and the European Public Prosecutor's Office (EPPO).</p>
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>The following IT facilities may be used, which implies possible transfer:</p> <ul style="list-style-type: none"> <li>• WEBEX for web conference services (see <a href="#">Privacy Statement for WEBEX</a>)</li> <li>• TEAMS (see <a href="#">Privacy Statement for M365</a>)</li> <li>• SLIDO as online audience interaction tool to enable event participants to engage and ask questions, in accordance with its privacy policy ( <a href="https://ec.europa.eu/dpo-register/detail/DPR-EC-06687">https://ec.europa.eu/dpo-register/detail/DPR-EC-06687</a> ) SLIDO users who are not willing to share their personal data with this tool can simply reply</li> </ul>

	<p>anonymously. As SLIDO was acquired by Cisco Systems, Inc (WEBEX), personal data may be transferred to Cisco</p> <ul style="list-style-type: none"> <li>• VIMEO (see <a href="#">Privacy Policy on Vimeo</a>)</li> <li>• MIRO as online collaborative whiteboard platform to enable event participants to collaborate in real-time, in accordance with its privacy policy (: <a href="https://miro.com/legal/privacy-policy/">https://miro.com/legal/privacy-policy/</a>)</li> </ul> <p>In order to deliver the services, the use of WEBEX, TEAMS, SLIDO, VIMEO and MIRO may imply the possible transfer of personal data to the U.S and for WEBEX/SLIDO also to the UK: such transfers are based on the Adequacy Decisions signed with the US and the UK.</p> <p>The information collected will not be given to any third party, except to the extent and for the purpose we may be required to do so by law.</p>
13	<p><b>General description of the technical and organisational security measures</b></p> <p>The E4C platform is a network site based on the Europa Communities Platform Software as a Service (ECP SaaS) established on Open Social - a DIGIT proposed third party solution - which is a ready-to-use Drupal Content Management System with standard functionalities to create and manage external communities websites under europa.eu.</p> <p>The IT systems used by the Agency are the ones of the European Commission (EC) and abide by the EC's security guidelines. The Agency is bound by the EC Decision (EU, Euratom) 2017/46 of 10 January 2017 on the security of communication and information systems in the European Commission.</p> <p><b>1. Organisational measures:</b></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 authorising the access - except in limited cases of delegation. The 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 or e-/folders of the Commission and all Agency staff are bound by a confidentiality obligation. The need-to-know principle applies in all cases.</p> <p><b>2. Technical measures:</b></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. The platform is hosted on the EC Europa domain, which is under DG DIGIT's control and abides by strict security and protective measures.</p> <p>EACEA's contractors are bound by a specific contractual clause for any processing operations of the data on behalf of the Agency, and by the confidentiality and data protection obligations, deriving from the application of the Regulation and the General Data Protection Regulation in the EU Member States ('GDPR' Regulation (EU) 2016/679).</p>
14	<p><b>Information to data subjects / Data Protection Notice (DPN)</b></p> <p>Data subjects will be informed about the processing of their data. A Data Protection Notice (DPN) relevant to this data processing activity is available on the homepage (footer) of the platform ( <a href="https://education-for-climate.ec.europa.eu/DPN">https://education-for-climate.ec.europa.eu/DPN</a>).</p>