



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°

2024-01

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.

[Processing of personal data by the Staff Committee of the EACEA]	
1	Last update of this record (where applicable) N/A it is the first version of the record.
2	Short description of the processing This processing activity covers the processing of personal data by the EACEA Staff Committee.
Part 1 - Article 31 on Record	
3	Name of the Controller Unit(s) and/or function of person acting on behalf of the Controller Controller: Staff Committee of the European Education and Culture Executive Agency

	<p>(EACEA). The Staff Committee is represented by its Chair, vice-Chair or one of its full members for data processing.</p> <p>Unit(s): N/A</p> <p>Functional e-mail address: EACEA-STAFF-COMMITTEE@ec.europa.eu</p> <p>Ares virtual entity: ve_eacea.staff.committee (EACEA)</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>N/A</p>
7	<p>Purpose of the processing</p> <p>Processing personal data to represent the interests of EACEA staff and to provide a channel for expression of the opinions of such a staff in line with Decision AE/2007/CD02/D-39 setting up a Staff Committee:</p> <p><i>"Art 1: The Staff Committee shall represent the interests of the staff vis à vis the EACEA and maintain continuous contact between the EACEA and its staff. It shall contribute to the smooth running of the Agency by providing a channel for the expression of opinion by the Staff."</i></p> <p>Collecting and processing personal data contained in queries sent by EACEA staff or staff from other European Institutions to the EACEA Staff Committee and either providing them with an answer or using them in an anonymised way to undertake any action falling within the remit of the EACEA Staff Committee.</p> <p>Collecting and processing personal data for EACEA staff selection and reclassification files/tasks in which the EACEA Staff Committee is involved.</p>
8	<p>Description of the categories of data subjects</p> <p>Whose personal data are being processed? In case data categories differ between different categories of persons, please explain as well (e.g. suspects vs. witnesses in administrative inquiries)</p> <p><input checked="" type="checkbox"/> Agency staff (Contractual and temporary staff in active position)</p> <p><input type="checkbox"/> Visitors to the Agency</p> <p><input type="checkbox"/> Contractors providing goods or services</p> <p><input checked="" type="checkbox"/> Applicants</p> <p><input type="checkbox"/> Relatives of the data subject</p> <p><input checked="" 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 checked="" type="checkbox"/> Other, please specify: Staff of other executive agencies and European institutions.
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>a) Categories of personal data:</p> <p><input checked="" type="checkbox"/> in the form of personal identification numbers (personal number)</p> <p><input type="checkbox"/> concerning the physical characteristics of persons as well as the image, voice or fingerprints</p> <p><input type="checkbox"/> concerning the data subject's private sphere</p> <p><input type="checkbox"/> concerning pay, allowances and bank accounts</p> <p><input checked="" type="checkbox"/> concerning recruitment and contracts (applications, CVs, motivation letters, type of contracts, function group and grades)</p> <p><input type="checkbox"/> concerning the data subject's family</p> <p><input checked="" type="checkbox"/> concerning the data subject's career (job title/function, unit and sector of assignment, seniority in the grade, appraisal reports, reclassification path)</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 checked="" type="checkbox"/> concerning telephone numbers and communications (professional phone number, private phone number)</p> <p><input checked="" type="checkbox"/> concerning names and addresses (including email addresses)</p> <p><input checked="" type="checkbox"/> Other: please specify: Queries, and opinions of the EACEA staff on different matters relating to the Agency or European Institutions and/or the description of issues and difficulties experienced by the staff member concerned .</p> <p>b) Categories of personal data processing likely to present <u>specific risks</u>:</p> <p><input type="checkbox"/> data relating to suspected offences, offences, criminal convictions, or security measures</p> <p><input checked="" type="checkbox"/> data being used to evaluate personal aspects of the data subject (ability, efficiency, conduct, etc): such as applications, CVs, motivation letters, appraisal reports, complaints on appraisal reports or reclassification, career path, working environment, etc.</p> <p>c) Categories of personal data whose processing is <u>prohibited</u>, with exceptions (art. 10):</p> <p><input checked="" type="checkbox"/> revealing racial or ethnic origin</p> <p><input checked="" type="checkbox"/> revealing political opinions</p> <p><input checked="" type="checkbox"/> revealing religious or philosophical beliefs</p> <p><input checked="" type="checkbox"/> revealing trade-union membership</p> <p><input checked="" type="checkbox"/> concerning health</p> <p><input type="checkbox"/> genetic data, biometric data for the purpose of uniquely identifying a natural person</p> <p><input checked="" type="checkbox"/> concerning sex life or sexual orientation</p>

	<p>d) Specify any additional data or explanatory information on the data being processed, if any:</p> <p>Sensitive categories of personal data, such as health issues, sexual orientation, religious beliefs, political orientation, trade Union membership, etc may be collected and processed in very exceptional circumstances, for example if a staff member reports on particular issues or difficulties experienced due to health problems, disputes, etc. But this concerns isolated and rare cases.</p>
10	<p>Retention time (time limit for keeping the personal data)</p> <p>The personal data concerned will be kept as long as necessary and until the end of the mandate of the current EACEA Staff Committee (3 years) and specifically until the next EACEA Staff Committee enters into service to ensure that the handover from the previous Staff Committee is provided. Data will be deleted at the end of this period</p> <p>According to the 2022 EC Retention list (12.2.1), files covering exchanges with the Staff Committees on elections, the consultation of the Central Staff Committee, the relations with the Joint Committees and minutes of meetings may be kept for 10 years.</p> <p>Indicate the period of storage: in accordance with the ARP above-mentioned.</p> <p>Is any further processing for historical, statistical or scientific purposes envisaged? <input type="checkbox"/> yes <input checked="" type="checkbox"/> no</p> <p>If yes, indicate the further retention time:</p>
11	<p>Recipients of the data</p> <p>The recipient to whom the personal data will or might be disclosed are active members of the EACEA Staff Committee and alternates.</p> <p>The Staff Committee is bound to ensure the confidentiality of the communications received vis-à-vis the Agency and any other party (e.g., the Common Staff Committee of the Executive Agencies – CSC, etc.) and can only reveal personal data with the prior explicit consent of the concerned staff member to the EACEA management or to any other concerned party.</p> <p>In case of audit or proceeding, the bodies charged with an investigation or inspection task in application of Union law may access data (e.g. Internal Audit Service, Court of Auditors, OLAF, EPPO, EU Courts, EDPS, etc.).</p>
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>Personal data will not be transferred to third countries or international organisations. The processing takes place only within the EU.</p>
13	<p>General description of the technical and organisational security measures</p> <p>The processing of the personal data by the Staff Committee does not include any automated decision-making and is done via the IT tools used by the Agency.</p> <p>The Agency follows the Commission's security guidelines and uses the European Commission's IT systems. 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</p>

	<p>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 Staff Committee in charge of the process collects and places the documents on the secured drives of the Agency. Each Staff Committee Member as Agency staff is bound by a confidentiality obligation. The need-to-know principle applies in all cases.</p> <p>Only active EACEA Staff Committee members have access to the above-mentioned functional mailbox and to the Ares virtual entity. The former is the official communication channel with the EACEA Staff Committee through which queries and messages are usually received. All computers of EACEA staff are password protected. Paper files are usually not used; if used they are destroyed after its use thus not stored.</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 / Data Protection Notice (DPN)</p> <p>Data subjects are informed on the processing of their personal data via a data protection notice on their rights:</p> <ul style="list-style-type: none"> - to access their personal data held by a controller. - to request their personal data held by a controller to be corrected. - to obtain in some situations erasure of their personal data held by a controller, e.g., when data are held unlawfully (right to be forgotten); - to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal. - to recourse at any time to the EACEA Data Protection Officer and to the European Data Protection Supervisor (at https://edps.europa.eu). <p>Request from a data subject to exercise a right will be dealt within one month.</p> <p>Any query concerning the processing of personal data, must be addressed to the Data Controller indicated above in Part 1(3).</p>