



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°

05-2024

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.*

Erasmus+ International Student and Alumni Networks	
1	Last update of this record (where applicable)
	N/A This is the first version of the record.
2	Short description of the processing
	<p>The Erasmus+ International Student and Alumni Networks (hereafter Alumni Networks) constitute communities of Erasmus+ students and alumni. The networks are supported by the European Education and Culture Executive Agency (EACEA) and managed by a consortium of organisations (ICF and BDO) that provide support under a framework contract signed with EACEA. The Alumni Networks use online websites (referred as the platform(s)) based in Germany.</p> <p>The platforms promote networking, knowledge building, peer learning, exchange, and collaboration among members of the Alumni Networks and stakeholders. Personal data processing is necessary to register interested</p>

	<p>individuals as members of the Alumni Networks, to give registered members access to the platform, in order to create user accounts. Once members have access to the platform they are able to network and engage in the activities conducted on the sites (e.g., upload or download information or documents, make announcements, participate in networking activities, attend online and in-person events, subscribe to newsletters, share experiences and manage their own personal entails to their profiles).</p> <p>Information on the processing of personal data occurring within each specific platform is available in the data protection notice of the corresponding network.</p>
Part 1 - Article 31 Record	
3	<p>Name of the Controller</p> <p>Unit(s) and/or function of person acting on behalf of the Controller</p> <p><u>Head of Unit A.4, International Capacity Building</u></p> <p><u>European Education and Culture Executive Agency (EACEA)</u></p> <p><u>EACEA-EPLUS-ALUMNI@ec.europa.eu</u></p>
4	<p>Contact details of the Data Protection Officer (DPO)</p> <p><u>EACEA-data-protection@ec.europa.eu</u></p>
5	<p>Name and contact details of joint controller (where applicable)</p> <p>Not applicable</p>
6	<p>Name and contact details of processor (where applicable)</p> <p>The following contractors of EACEA act as data processors:</p> <p>1) ICF S.A. Avenue Marnix 17, 1000 Brussels Project team email: <u>EPLUS-alumni-support@icf.com</u> ICF's DPO: Geraldine Henbest Email: <u>dataprotection@icf.com</u></p> <p>2) BDO Advisory Av Louise 326 boîte 30, Brussels Email : <u>dpo.intern@bdo.be</u></p>
7	<p>Purpose of the processing</p> <p>The purpose of the processing is to support the networks of the Erasmus+, including facilitating peer learning, exchange and knowledge-building activities, as well as providing information about the network and its events/activities. The online web presence fosters the sharing of knowledge and experience, connects education stakeholders and stimulate collaboration among various Erasmus+ International Alumni networks.</p> <p>The personal data collected is required:</p>

	<ul style="list-style-type: none"> i. To invite the Alumni to register as members and create user profiles on the Network Community platform; ii. To provide a collaborative online space among the members of the Alumni Network; iii. Inform & communicate about Alumni Network activities by means of newsletters; iv. To contact interested Alumni Network members regarding participation or contribution at an event and/ or to take part in mentoring activities, workshops, seminars, conferences, which may also be part of a process of selecting candidates for activities with limited numbers of participants ; v. To conduct surveys; vi. To develop and maintain a database of contact details of survey respondents, for reuse in successive stages of surveying for longitudinal surveys such as the Erasmus Impact Study, graduate tracking surveys and the Erasmus Mundus Graduate Impact Survey ('GIS'); vii. To engage members in the Community activities on the platform and allow them to communicate, network and collaborate through posts, reactions and chats; viii. To organise and manage online events (e.g. workshops, web-seminars, stakeholder meetings and round tables, board meetings, general assemblies, trainings, mentoring activities, peer-learning) through audio-visual conferencing and/or recording; ix. To allow for the sharing of the meeting/event attendee list containing their name and affiliation among other participants, in order to create working groups to continue the collaborate work launched during the meeting/event; x. To offer and manage other online learning activities (e.g., self-assessments as part of the feedback after trainings); xi. To organise and manage physical events, including to contact the participants regarding organisational information (e.g., agenda, travel expenses, hotel, organising networking dinners and lunches in compliance with food allergies declared by participants); and to illustrate, promote or document the physical activities; xii. To document conducted activities and showcase the best digital solutions by submitting digital artifacts (e.g., minutes, publications, reports, news items, case studies and/or other outputs); xiii. To allow for the analysis of members' feedback on Community activities (the main objective being quality monitoring and improvement); xiv. To monitor and evaluate the Community's growth by keeping track of the number of members, also in relation to represented sectors of education and training and members' geographical location; xv. To inform about results and developments, upcoming events and/or other related initiatives of the EACEA/European Commission through a dedicated newsletter; xvi. To handle helpdesk inquiries and to provide technical support; xvii. To be able to provide inclusive and accessible settings at physical events; xviii. Management of email support, such as creating and providing email accounts for new board members and other network members who need them to conduct their network-related activities. <p>The personal data of registered members will not be used for any automated decision-making, including profiling.</p>
8	<p>Description of the categories of data subjects</p> <p>Whose personal data are being processed?</p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Agency staff (Contractual and temporary staff in active position) <input checked="" type="checkbox"/> Visitors to the Agency <input checked="" type="checkbox"/> Contractors providing goods or services <input checked="" type="checkbox"/> Applicants <input type="checkbox"/> Relatives of the data subject <input checked="" type="checkbox"/> Complainants, correspondents and enquirers

	<input type="checkbox"/> Witnesses <input checked="" type="checkbox"/> Beneficiaries <input checked="" type="checkbox"/> External experts <input checked="" type="checkbox"/> Contractors <input checked="" type="checkbox"/> Other, please specify: <p>Students and alumni having participated in an Erasmus + International mobility programme: Erasmus Mundus programme, International credit mobility, Intra ACF/Intra Africa, etc...</p> <p>Members of the students and alumni networks related to the above programmes: The African Students and Alumni Forum (ASAF), Erasmus+ Students and Alumni Alliance (ESAA), Erasmus Mundus Association (EMA), Erasmus Student Network (ESN), garagErasmus, OCEANS Network, The Western Balkans Alumni Association (WBAA). This list can be extended in the future.</p>
9	Description of personal data categories
	<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</p> <p>ID passport or identity card numbers: date of issue and expiry date may be collected, so that the data subjects may obtain access to the premises where the meeting/event is held</p> <p><input checked="" type="checkbox"/> concerning the physical characteristics of persons as well as the image or voice</p> <p>Network members may voluntarily submit or share their image and voice during online events, in videoconferencing, 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., as part of photo contests, news items, and event announcements. They may also voluntarily share their experiences, opinions, pictures and quotes for articles to be published within the platform.</p> <p>Speakers and participants who take part in online or physical events may have recordings, live-streaming and photographs of themselves taken during the events, to be used for promotion on the platform or social media accounts owned by the networks and managed by ICF. Data subjects can publish images of any other data subject only with their explicit consent.</p> <p><input checked="" type="checkbox"/> concerning the data subject's private sphere</p> <p>At registration, network members may indicate their area(s) of interest. After registration, members may provide information on their personal motivation to join the network; they may post links and other resources that can belong to their private sphere, such as blogs or personal websites.</p> <p><input checked="" type="checkbox"/> concerning pay, allowances and bank accounts (in case of reimbursement)</p> <p>To reimburse travel costs or fees for physical events, bank details/card number/bank account will be collected from event participants.</p> <p><input checked="" type="checkbox"/> concerning recruitment and contracts</p> <p><input type="checkbox"/> concerning the data subject's family</p>

☒ **concerning the data subject's career (University curriculum, professional position)**

All members will share their current professional role and field of work when registering. In the context of self-assessment activities, providing information on current institutional affiliation, professional role and field of work is mandatory as it serves to guide the mentoring and training.

Individuals can provide additional professional information, including on their experience and field(s) of expertise, as well as relevant achievements (e.g. job position, publication, course taught or a project managed). In the context of preparations for events, participants may be asked to submit data regarding their experiences with the topic of the event and their intended follow-up actions after the event in survey questionnaires.

In the context of articles to be published online, on the Alumni Network platforms and social media accounts of the networks, participants may voluntarily share experiences, opinions, pictures and quotes.

☐ concerning leave and absences

☒ **concerning missions and journeys (travels organised within the alumni activities)**

To be able to reimburse travel, accommodation and subsistence costs for physical events, information on itineraries and travel receipts need to be collected from participants.

☐ concerning social security and pensions

☐ concerning expenses and medical benefits

☒ **concerning telephone numbers and communications (mobile phone/phone number)**

For organising travel, accommodation, or attending online events;

Optional: Community members may share on a voluntary basis their telephone numbers with other members on the platform; they may also share their social media handles.

☒ **concerning names and addresses (including email addresses)**

To register, users must submit their first name, last name, function/title, country of residence, nationality, and e-mail, address. To request technical support, users must submit their first name, last name and e-mail address.

☒ **Other: please specify:**

- Analytical data related to survey responses is collected.
- Technical identifiers: To ask for assistance when facing technical problems with the platform, registered members may share screenshots providing information about their personal computers, internet connection and account settings, such as IP addresses and account usernames.

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):

☐ revealing racial or ethnic origin

☐ revealing religious or philosophical beliefs

	<input type="checkbox"/> revealing trade-union membership <input checked="" type="checkbox"/> concerning health Participants may voluntarily share their food preferences (vegetarian options, etc.) or specific access requirements when registering for physical events. <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 d) Specify any additional data or explanatory information on the data being processed, if any: Not applicable
10	Retention time (time limit for keeping the personal data) The Data Controller only keeps your personal data for the time necessary to fulfil the purpose of collection or further processing. Indicate the period of storage: <i>Personal data collected to register to the platform:</i> <ul style="list-style-type: none"> • Approved members: for as long as the member's account is active. Service generated data (log files) are kept for up to six months. • Non-approved members: their data is fully erased six months after their rejection. The personal data of the members of the platform 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 as new members. <i>Personal data gathered for online or physical events/workshops/ etc.:</i> Data gathered for physical events, including survey responses (except regarding travel to/from the events, mentioned below) will be kept for six months. Live-streaming and audio-visual recordings of events will be kept for up to five years after the meeting or event. Sensitive personal data relating to dietary and/or access requirements will be deleted as soon as they are no longer necessary for the purpose for which they have been collected in the framework of the meeting or event, but no later than maximum 1 month after the end of the meeting/ event/ workshop. Personal data concerning pay, allowances and bank accounts and missions and journeys will be kept for 10 years in order to comply with the audit/accounting obligations of the responsible data processors. Personal data collected for future mailing purposes linked to activities of Alumni Networks (via newsletters or invitations to similar events) will be kept until data subject unsubscribes from the mailing list. Personal data shared with the Directorate-General for Human Resources and Security of the European Commission for the participants to gain access to Commission buildings is kept for 6 months after the termination of the link between the data subject and the Commission (e.g.: for visitor: end of the visit plus 6 months).

	<p>Further details of processing and relevant data retention periods may be applicable, as each (type of) activity in support of the Alumni Networks may be different. Where this is the case, the details of processing and applicable retention will be described in the corresponding data protection notices for each specific Alumni Network or specific (category of a) activity.</p> <p>Is any further processing for historical, statistical or scientific purposes envisaged?</p> <p><input type="checkbox"/> yes <input checked="" type="checkbox"/> no</p> <p>If yes, indicate the further retention time: NA</p>
11	<p>Recipients of the data</p> <p>Personal data will be made accessible on need-to-know basis to the authorised staff within the following recipients:</p> <ul style="list-style-type: none"> - EACEA. - European Commission, Directorate General Education and Culture (EAC) - European Commission, Directorate General International Partnerships (INTPA) - European Commission, Directorate General Neighbourhood & Enlargement Negotiations (NEAR) - EU Delegations in third countries - European External Action Service - Contractor of the Framework services contract n° SI2.3707: consortium between ICF S.A. (BE) and BDO ADVISORY (BE) - Board of the Alumni Networks: The applicable data protection notice of each Alumni Network website is published on each website as follows: <ul style="list-style-type: none"> ▪ ASAF: Privacy Policy ASAF ▪ ESAA: Legal mentions ESAA (esaa-eu.org) ▪ EMA: Privacy Policy & Terms of Use Erasmus Mundus Association (EMA) (em-a.eu) ▪ OCEANS: Legal mentions OCEANS Network (oceans-network.eu) ▪ WBAA: Legal Mentions WBAA (western-balkans-alumni.eu) - Registered members of the Alumni Networks platforms - General public (limited to the public website information and other publications for which the data subject has given consent to be used for communication purposes, including on social media) <p>Third party tools/service providers used for the organisation and management of the Alumni Networks and related activities (e.g., websites, surveys, events, newsletters):</p> <ul style="list-style-type: none"> • Subcontractors <ol style="list-style-type: none"> I. Gray Dawes, based in the United Kingdom, serves as the travel agency used to book flights, link to Gray Dawes privacy policy: here. II. Selected hotels (identified on a case-by-case basis for each event) III. PPW provider of data hosting for Alumni Networks websites (data centres in Germany and hosted by IONOS SE) • Third party tools <ol style="list-style-type: none"> IV. Jotform platform or EU Survey: for the purpose of organising event registration, surveys, reimbursemet potform. Jotform privacy policy.

	<p>ICF has a data processing agreement (aligned with Art 28 GDPR requirements for processors) with Jotform entity established in the UK. In accordance with the terms of our data processing agreement, JotForm stores and processes data in data centres in the EU (Germany). Transfers do not apply unless notified and authorised in advance. Jotform has confirmed Jotform is pursuing to renew its EU-US Privacy Framework certification.</p> <p>V. Intuit Mailchimp and KG CleverReach GmbH & Co.: serve as the Alumni Networks newsletter tools.</p> <ul style="list-style-type: none"> – link to Mailchimp privacy policy: here – link to Cleverreach privacy policy: here <p>VI. Microsoft TEAMS (for online events). ICF's O365 data is located in the EU.</p> <p>VII. UNA CMS Alumni community platforms (as set up by GIZ/Mosaic consortium), used until the migration of the alumni platforms into the European Union's EU Alumni platform on Europa.</p> <p>VIII. Tools detailed in the data protection notices as network management/communication tools.</p> <p>Only the data listed above will be processed by these subcontractors or third parties.</p> <p>In addition, in case of control or proceedings, 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 - European Data Protection Supervisory Authority - EU 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>Yes. In the context of online and onsite activities related to the management of the Alumni Networks including websites, events/meetings/ workshops/surveys/newsletter and communication, personal data will be transferred to:</p> <ul style="list-style-type: none"> - Gray Dawes in the United Kingdom (travel agency used to book travel). Such transfer is compliant with Regulation (EU) No 2018/1725, on the basis of the relevant European Commission's adequacy decision. - For the organisation of certain events taking place outside of the EU, the booking of travels/accommodation of EU participants will require the collection and transfer of data to these third countries. Occasionally personal data (name/family name) of EU participants (if any) will be transferred to local hotels for booking purposes. Such bookings and subsequent transfers of EU personal data will be made upon, as applicable, on the EU Standard Contractual Clauses Module 1 (Controller to Controller) signed with the relevant hotel or on the explicit consent of the data subjects, (Art. 50.1(a.) of Regulation (EU) 2018/1725). - For the following, transfer is based on the Adequacy Decision with the US: - Intuit Mailchimp (newsletter tool) is certified under the EU-US Data Privacy Framework: https://www.dataprivacyframework.gov/list. Mailchimp compliance website is available here: GDPR Compliance. Microsoft Teams used for the online events, workshops. ICF's O365 data is located in the EU. Microsoft is a US-based company and participates in the EU-US Data Privacy Framework. Microsoft

	<p>compliance website is available here: General Data Protection Regulation Microsoft GDPR Microsoft Docs</p> <ul style="list-style-type: none"> - Temporary use of Google's Gmail and Google Workspace (network management/communication tool) - participates in the EU-US Data Privacy Framework list https://www.dataprivacyframework.gov/list <p>In case of transfers of personal data under a specific activity related to Alumni Networks should occur, this will be detailed in the data protection notice of the specific activity.</p> <p>The transfer is necessary for important reasons of public interest as recognised in the Union law (Article 50.1.d of the Regulation):</p> <ul style="list-style-type: none"> - Article 14 of the Charter of Fundamental Rights of the European Union, - Article 26 of the Universal Declaration of Human Rights, - Article 11 of the Treaty of the European Union - Article 15 of the Treaty on the Functioning of the EU <p>The Erasmus Programme funding this process encourages the participation of young people/individuals in Europe's democratic life, including by supporting activities that contribute to citizenship education and participation projects for young people to engage and learn to participate in civic society, thereby raising awareness of European common values (see Recital n° 28 of the Erasmus Regulation (Regulation (EU) 2021/817)).</p>
13	<p><u>General</u> 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><u>1. Organisational measures:</u></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 of the Commission and all Agency staff are bound by a confidentiality obligation. The need to know principle applies in all cases.</p> <p><u>2. Technical measures:</u></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> <p>Measures taken by the contractor:</p> <p>The contractors and their selected service providers (such as caterers, travel agents) are contractually bound to process personal data on behalf of and in line with the instructions of the data controller, keep confidential any data they process and protect it from unauthorised access, use and comply with retention requirements.</p> <p><u>ICF SA (Lead contractor):</u></p> <p>ICF is an ISO27001 accredited organisation.</p> <p>Data security is managed in accordance with ICF's Information Security policy which details comprehensive measures relating to: physical security, communications and operations management including network security management; access control including review of access rights, user authentication of external</p>

	<p>connections, equipment identification in networks, remote diagnostic and confirmation port protection and segregation in networks, incident management and business continuity management.</p> <p>On receipt, such sensitive electronic data is encrypted and held on a secure server, with access to it being restricted to members of specific project teams (using access control lists). No sensitive information is stored on the researcher's hard drives or other portable media - although all corporate endpoints are deployed with full disk encryption to mitigate the potential for data loss.</p> <p>All ICF's premises sit behind enterprise firewalls that restrict inbound and outbound traffic to authorised traffic and apply intrusion detection. In circumstances where full isolation is required, data is securely stored on a separate device that is removed from all network access (both internal and external [internet]).</p> <p>All systems require password authentication to access. Company policy dictates use of a strong password policy, a mix of character types and this must be changed At regular intervals in accordance with the group Information Security Policy</p> <p>ICF has well developed procedures in place to ensure the secure transfer of sensitive electronic data between ourselves, clients and subcontractors where appropriate. Where sensitive data is transferred we use secure, industry leading methods using strong encryption both prior to the transfer, and during the transfer.</p>
14	<p>Information to data subjects / Data Protection Notice (DPN)</p> <p>Data protection notices are available on each Alumni Network platform, as follows:</p> <ul style="list-style-type: none"> • ASAF: https://www.asaf.africa/community/privacy-policy • EMA: https://www.esaa-eu.org/community/ema/privacy-policy • OCEANS: https://www.oceans-network.eu/community/privacy-policy • WBAA: https://www.western-balkans-alumni.eu/community/privacy-policy/ <p>Data subjects will be informed about the processing of their data, with the data protection notice being published/made available on each Alumni Network platform and/or for each relevant activity. Data subjects will have access to the DPN at the specific landing page and as appropriate as part of the registration page for events, survey, newsletter subscription etc.</p>