EUROPEAN COMMISSION
European Education, and Culture Executive Agency

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°	03-2022

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.*

European School Education Platform	
1	**Last update of this record (where applicable)**
	Last update on 20/05/2022.
2	**Short description of the processing**
	The European School Education Platform (referred here as 'the Platform') is the successor of the School Education Gateway and the eTwinning platforms. Launched in 2022, this multilingual online platform aims to be the meeting point for all school staff (from early childhood education and care, to primary and secondary levels, including initial vocational education and training), researchers, policy makers and other stakeholders in the school education field.

Personal data are provided in 2 layers: |

	1) registration with EU login ad "general" users, in order to participate in 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). 2) Additional registration as eTwinning user (eTwinner): A specific area of the Platform is 'eTwinning' which offers a restricted area for staff working in a school (teachers, head teachers, librarians, etc.), in one of the countries involved, to communicate, collaborate, develop projects, share and engage in the online community. Users who apply to eTwinning have to be validated by National Support Organisations of their countries to become an eTwinner and have access to the restricted eTwinning area, where they can communicate, collaborate, meet, chat, develop projects, participate in professional development activities, etc At the moment of launching the European School Education Platform, existing users of eTwinning and/or of the School Education Gateway must create an EU Login account with the same email address used when registering in eTwinning or on the School Education Gateway in order to synchronise their old and new accounts, including migration of personal data to the new account.

Part 1 - Article 31 Record

3	**Name of the Controller** **Unit(s) and/or function of person acting on behalf of the Controller** Controller: European Education and Culture Executive Agency (EACEA) Avenue du Bourget 1, BE-1049 Brussels Head of Unit A6: Unit: A6 Platforms, Studies and Analysis Email: eacea-eplus-etwinning@ec.europa.eu
4	**Contact details of the Data Protection Officer (DPO)** EACEA-data-protection@ec.europa.eu
5	**Name and contact details of joint controller** **(where applicable)** N/A
6	**Name and contact details of processor** **(where applicable)** EUN Partnership AISBL (hereinafter called European Schoolnet) runs the eTwinning Central Support Service as a contractor of the European Education and Culture Executive Agency. Rue de Trèves, 61 (3rd floor) 1040 Brussels Belgium Tel: +32 2/790 75 75 Email: info@eun.org Website: www.eun.org In addition, Tremend Software Consulting SRL provides the digital services needed to manage and maintain eTwinning.net also as contractor of EACEA. 83 Cluj Stroot, bl. 8B, sc. 1, floor 7, ap.32 RO-030134 Bucuresti (Bucharest) Romania

	Tel: +40-21-223-7700 Email: hello@tremend.com Website: https://tremend.com/ The EU Commission Directorate-General for informatics (DG DIGIT) provides the IT hosting service for the platform.	
7	**Purpose of the processing**	

The processing of personal data in the Platform is necessary to:
- Allow users to use platform's services such as:
    - posting comments and listings,
    - using different platform features such as favourites or saved searches,
    - enriching users' profiles,
- handle helpdesk inquiries, follow up on posts and messages which were 'reported' by other users, etc.,
- allow Platform users to communicate and collaborate in the spirit of mutual trust and respect,
- allow and facilitate monitoring and research activities,
- develop outreach and communication purposes within the framework of the Platform and its services,
- send registered users updates and relevant information related to the Platform, and to inform registered users of other related activities they might be interested in within European Commission's initiatives,
- enable online course administration and implementation,
- enable and improve the user experience within this and similar future projects developed by the European Commission via access control, tracking usage frequency, search behaviours, preferences and settings,
- allow for collection, categorisation and summary of user contributions in the forums and other discussion tools,
- provide aggregated statistics, including, but not limited to, the number of users during a specific period, the preferred subjects and/or countries chosen by users and account usage.

Furthermore, and limited for the eTwinning area, the processing of data is necessary to:
- provide information about registrants' activities within and outside the eTwinning area of the platform to establish and maintain online community's activities,
- allow registrants to find partners and set up projects,
- provide information about their eTwinning projects,
- allow eTwinning registrants to communicate and collaborate in the spirit of mutual trust and respect; and,
- allow and facilitate monitoring and research activities.

8	**Description of the categories of data subjects**

Whose personal data are being processed?

☐ Agency staff (Contractual and temporary staff in active position)

☐ Visitors to the Agency

☐ Contractors providing goods or services

☐ Applicants

☐ Relatives of the data subject

☒ Complainants, correspondents and enquirers

☐ Witnesses

	☐ Beneficiaries
	☐ External experts
	☐ Contractors
	☒ Other, please specify: individuals who decide to register on the European School Education Platform or in the eTwinning restricted area (validated school staff) and any person participating in the activities organised by the eTwinning users. In addition, contact details of National Support Platform are published on the Platform.
9	**Description of personal data categories**
	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): *a) Categories of personal data:* ☐ in the form of personal identification numbers ☒ concerning the physical characteristics of persons as well as the image, voice or fingerprints (optional) 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. ☒ concerning the data subject's private sphere (optional) Information from forums and other online communication tools: the Platform offers public forums (or similar third-party communication tools) as part of its collaborative spaces. On these online tools the users may share comments, thoughts, photos, videos and other resources on a voluntary basis. The platform is allowing users to use third party tools as an option. However these tools apply their own privacy policies which are clearly shared with end-users. By using such third party tools, users accept that their personal data will be processed by these third parties (as controllers); ☐ concerning pay, allowances and bank accounts ☐ concerning recruitment and contracts ☐ concerning the data subject's family ☒ concerning the data subject's career (optional) The Platform may receive personally identifiable information when information is provided in response to a survey (in this case the user is asked to provide consent for sharing such information). If the person participates in an online course or in a project, 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. ☐ concerning leave and absences ☒ concerning missions and journeys Participants may take part in events onsite in their country or another one. They may submit information for the purpose of participating in such initiatives. ☐ concerning social security and pensions ☐ concerning expenses and medical benefits ☐ concerning telephone numbers and communications ☒ concerning names and addresses, including email addresses (mandatory)

| | | ☒ Other: please specify: For eTwinning users, the school and the professional role in the school is mandatory. For NSO representatives they upload themselves their personal data (contact details and name of the organisation).

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 political opinions

☐ revealing religious or philosophical beliefs

☐ revealing trade-union membership

☐ concerning health

☐ genetic data, biometric data for the purpose of uniquely identifying a natural person

☐ concerning sex life or sexual orientation

Unsolicited personal data of this nature can be submitted by the data subjects, which will however be disregarded and not processed

d) Specify any additional data or explanatory information on the data being processed, if any: _____ |

| 10 | **Retention time (time limit for keeping the personal data)** |
| | A. For the general user registered in the European School Education Platform the data related to the 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 anonymous, i.e. the personal data will be erased.

Two weeks before three years of no login, a notification is sent to the user to inform her/him that her/his profile is about to be set as anonymous and that he/she can avoid this by logging in again within two weeks. If the user does not login within two weeks, his/her profile will be deleted permanently. In case of no login, all personal information 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) is not under the responsibility of the data controller and is therefore not concerned by the anonymisation.

In the event that users ask for the anonymisation of their account or the account is automatically anonymised, no data will be visible to other European School Education Platform users.

Data will be kept only in an anonymous form that does not allow for personal identification. If users with an anonymised account want to continue using the platform, they will need to register again.

The anonymised data (non-personal data) remain solely for research and monitoring purposes at the disposal of the EACEA, the EC, national or regional school authorities, authorities in charge of implementing the European School Education Platform and other third parties (see Point 6) under the authorisation of the data controller in an aggregated format. |

B. Regarding the data related to the profiles of eTwinning users, personal data related to the profile of the users are kept for a maximum of three years after the user's last login. After one year from the last login, the user profile will automatically be set to inactive, i.e., no longer visible to other users or the outside world. The user can re-activate her/his account by logging in again. A reminder is sent after two additional years informing the user that, three years after her/his last login, his/her profile will be anonymised.

In the event that users ask for the anonymisation of their account or the account is automatically anonymised, the personal data will be erased.

Data will be kept only in an anonymous form that does not allow for personal identification. If users with a deleted profile 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 EACEA, the European Commission, national or regional school authorities, authorities in charge of implementing eTwinning (Central Support Service and National Support Organisations) and other third parties (see point 6) under the authorisation of the Data Controller in an aggregated format.

Is any further processing for historical, statistical or scientific purposes envisaged?
☐ yes ☒ no

If yes, indicate the further retention time:

If the answer is yes, please go to Part 2, Storage and Security for technical safeguards.

11	**Recipients of the data**
	For the purposes detailed above, access to the full set of data is strictly limited to: • EACEA designated staff, • European Commission designated staff, in particular DG EAC and DG DIGIT and, for personal data of users following training courses on the EU Academy platform, JRC designated staff. • Authorised staff of the organisation contracted by and working on behalf of EACEA to implement the ESEP platform, i.e. Central Support Service (European Schoolnet) and digital service provider (Tremend Software Consulting SRL) **General Public**: Some data submitted by users will be displayed on the public area of the Platform, which means that such information is freely accessible on the Internet. In this case, users can delete if they wish their data. The data which may be, upon a user's decision, public are in particular the following: a) **Organisation data of the user** is visible to all users through the organisation's page: • name, address, city, country, picture, Facebook URL, Twitter URL, LinkedIn URL and website, • registrants affiliated to the organisation (first name, last name, country, picture), • courses, and Erasmus+ postings created by the members of the organisation. b) **ESEP (General) user data:** • the following user data are visible to all users only on the public organisation's page (if the user is affiliated to one or several organisations): first name, last name, country, a thumbnail of the picture (if provided), • 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 'favourited' by the user, and whether the registrant is eTwinning validated,

- any posting, comment, 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,

- user activity on the online courses is viewable only by the registered users who have also signed up to the specific online course.

The transfer of specific data to other third parties (e.g., research centres and universities) can be permitted under specific authorisation of the data controller, but data will be transferred in an anonymous format.

Some personal data will be accessible within the restricted area of eTwinning, of the eTwinning Groups and TwinSpaces only to the respective members of these areas.

c) eTwinning users' data
Access to the eTwinners data is strictly limited to:
- eTwinning validated users (upon login) can see the following data of other users: full set of data except users' email address and school leader's data,
- authorised staff of EACEA and the European Commission (DG EAC and DG DIGIT): full set of data,
- Authorised staff of the organisation contracted by EACEA to implement the eTwinning component of the ESEP platform, i.e. Central Support Service (European Schoolnet) and digital service provider (Tremend Software Consulting SRL): full set of data,
- National Support Organisations: have access to registrant data submitted on eTwinning.net in order to validate/manage their registration and certain activities (NSO have only access to the data of users of their respective countries).
- JRC designated staff for personal data of eTwinners who decide on a voluntary basis to follow training courses on the EU Academy platform.

In addition, data may be disclosed to public authorities, and processed by these authorities in compliance with the applicable data protection rules according to the purpose of the processing, including inter alia:

- The European Court of Justice or a national judge or authority as well as the lawyers and the agents of the parties in case of a legal procedure;
- The competent Appointing Authority in case of a request or a complaint lodged under Articles 90 of the Staff Regulations;
- OLAF in case of an investigation conducted in application of Regulation (EC) No 1073/1999;
- The Internal Audit Service of the Commission within the scope of the tasks entrusted by article 118 of the Financial Regulation and by article 49 of the Regulation (EC) No 1653/2004;
- IDOC in line with Commission Decision of 12 June 2019 laying down general implementing provisions on the conduct of administrative inquiries and disciplinary proceedings - C(2019)4231 and Commission Decision (EU) 2019/165 of 1 February 2019 Internal rules concerning the provision of information to data subjects and the restriction of certain of their data protections rights in the context of administrative inquiries, pre-disciplinary, disciplinary and suspension proceedings;
- The Court of Auditors within the tasks entrusted to it by Article 287 of the Treaty on the Functioning of the European Union of the EC Treaty and Article 20, paragraph 5 of Regulation (EC) No 58/2003;
- The European Ombudsman within the scope of the tasks entrusted to it by Article 228 of the Treaty on the Functioning of the European Union;

	• The European Public Prosecutor's Office within the scope of Article 4 of Council Regulation (EU) 2017/1939 of 12 October 2017 implementing enhanced cooperation on the establishment of the European Public Prosecutor's Office. **Personal data can never be used for marketing purposes.**
12	**Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards?** Concerning eTwinning, there are transfers of personal data into third countries as certain NSO are based outside the European Union (EU) or the European Economic Area (EEA) in the following third countries: Albania, Algeria, Armenia, Azerbaijan, Bosnia and Herzegovina, Georgia, Jordan, Lebanon, Moldova, Montenegro, North Macedonia, Serbia, Tunisia and Turkey. The transfers to these countries are necessary for important reasons of public interest and are based on Article 50(1)(d) of Regulation (EU) 2018/1725. Please note that for these countries, the EU has not adopted an adequacy decision pursuant to Article 47 of Regulation (EU) 2018/1725, certifying that users' personal data once transferred, will benefit from an adequate level of protection in the third country of destination. Therefore, the level of protection of personal data transferred will depend on the law or practice of that third country and, as a result, users' rights as regards data protection might not be equivalent to those in an EU/EEA country or a country with an adequacy decision. The NSO is bound by data protection clauses, in particular in relation to lawfulness of processing and technical and organisational security obligations, under a grant agreement signed with the Agency. The users may request to obtain a copy of these clauses by contacting the controller. The data processor is bound by data protection clauses under a service contract signed with the Agency. Other data submitted by users on the eTwinning component of the platform (e.g., messages in forums, online discussions and threads, files and pictures) are only visible to other registered users related to the area of the Portal where they have been uploaded (e.g., eTwinning Groups, TwinSpace). Some of these users might be based in third countries.
13	**General description of the technical and organisational security measures** The Platform servers are hosted on Amazon Web Services in the European Data Centres. DG DIGIT manages the cloud infrastructure in a highly secured environment. Only authorised personnel have access to the storage media at the Data Centres and the sites are subject to strict physical security. DG DIGIT ensures the security of the IT hosting service in conformance with the Commission's Information Security Policy and Framework and DG DIGIT's complementary Information Security Policy Framework. See also Commission Decision C(2006)3602 of 16 August 2006 concerning the "Security of information systems used by the European Commission" and "Implementing rules of 16.8.2006 concerning the security of information systems used by the European Commission". Personal data is only communicated using HTTPS encryption. No personal data is transported using storage media. Additionally, any database backups are sanitised and user information is anonymised. DG DIGIT provides to the Central Support Service technical team anonymised database dumps. The database back-up service is behind a password-protected system. The anonymised database is used for platform development. All development servers are utilising strong password access and where required VPN encrypted connection, and in many cases biometric access. Online platforms used as part of the project use password protected access,

permission systems to prevent anyone but those authorised any access to personal data. No database back-ups containing personal data is stored on any removable storage devices.

Only a limited number of named individuals (maximum 3) from the development team in Tremend Consulting have access to the highest level of permission in information systems, and where personal data is stored in a document or database, it is only on a needs-access basis. By ensuring that the lowest number of users have access to the information systems, the data processor ensures the lowest level of risk.

Data in transit is encrypted via SSL/TLS, management access and data transfers on platforms are done securely.

A contractual clause about data protection is included in the contract with the processors (service providers) EUN Partnership AISBL and Tremend Software Consulting, to ensure that personal data are processed in compliance with the applicable legislation.

14	**Information to data subjects / Privacy Statement**
	European School Education Platform privacy statements for general users and for eTwinning users are available here https://school-education.ec.europa.eu/en/privacy-policy