



RECORD OF PERSONAL DATA PROCESSING

Record n°

08/2021

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.

Eurydice	
1	Last update of this record (where applicable) 03/07/25
2	Short description of the processing Eurydice is a network whose task is to explain how education systems are organised in Europe and how they work. It gives the opportunity to publish descriptions of national education systems, comparative studies devoted to specific topics on education, indicators and statistics in the field of education. In complementarity with Eurydice, the Mobility Scoreboard is a tool created to monitor progress toward the mobility targets set by the EU within the education and training sectors. From a technical standpoint, Eurydice includes the Mobility Scoreboard therefore this Record will apply to it as well. Both tools are under the responsibility of EACEA A6 which produces the reports in partnership with the National Units (grant beneficiaries' network). The National Units have access to the back office of the platform through the EU login and engage in activities conducted on the MS Teams platform. The website development is carried out by different external contractors (see below section on processors for more info).

Part 1 – General Information	
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) Officer designated in charge of the processing operation: Head of Unit EACEA.A6: Platforms, Studies and Analysis eacea-eurydice@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)
	<p>The European Commission</p> <ul style="list-style-type: none"> - Directorate-General for Informatics (DG DIGIT) provides the IT hosting service for Eurydice for instance such as Microsoft Office 365 (MS TEAMS),. - Directorate-General for Communications Networks, Content and Technology (DG CNECT) for the use of Newsroom <p>External contractors: WESTPOLE Belgium NV, Capgemini, ARHS Developments, which provides support to the website management of the National Policy Platforms; EUROPEAN SERVICE NETWORK SA and ECORYS EUROPE EEIG – GEIE. under DIGIT TM II Framework Contract. - contract SI2.4242 – EACEA/2024/OP/0001 – Lot 5,</p>
7	Purpose of the processing
	<p>The purpose of processing personal data is to operate Eurydice and provide related services such as:</p> <ul style="list-style-type: none"> • Handle helpdesk inquiries and surveys • Allow communication and collaboration • Facilitate the follow-up and monitoring activities of the community, the performance of ongoing activities disseminated on the Platform • Develop outreach and communication purposes within the framework of the Platform and its services, • Send newsletters related to the Platform to inform on updates and relevant information within European Commission's initiatives • Enable online trainings – both organisation and implementation • Enable and improve the user experience within this (and similar future) project(s) developed by the European Commission and EACEA via access control, tracking of usage frequency, search behaviours, preferences and settings • 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, to evaluate the access patterns and user preferences / requirements • Produce and disseminate videos and pictures featuring interviews with experts • Allow the publication of articles on the Platform • Evaluate and support the security and correct operation of the Platform, and the lawfulness of its use • Engage members in the Community activities on the MS Teams platform and allow them to communicate, network and collaborate through posts, reactions and chats

	<ul style="list-style-type: none"> Engage external speakers to participate in Eurydice events and seminars both in person and online Collect testimonials (in video or writing) for communication purposes. Various events (seminars, webinars, conferences, trainings, etc) organised in the context of Eurydice. eNewsletters (Newsroom). Collaboration with international organisations such as OECD and Cedefop. Editing of country news and country pages (national descriptions) in the Eurydice website
8	<p>Description of the categories of data subjects</p> <p>Whose personal data are being processed?</p> <p><input checked="" type="checkbox"/> Agency staff (Contractual and temporary staff in active position)</p> <p><input type="checkbox"/> Visitors to the Agency</p> <p><input checked="" type="checkbox"/> Contractors</p> <p><input type="checkbox"/> Applicants</p> <p><input type="checkbox"/> Relatives of the data subject</p> <p>Complainants, correspondents and enquirers</p> <p><input type="checkbox"/> Witnesses</p> <p><input checked="" type="checkbox"/> Beneficiaries</p> <p><input type="checkbox"/> External experts</p> <p><input checked="" type="checkbox"/> Event participants</p> <p><input type="checkbox"/> Other, please specify: any person participating in the activities organised by the Eurydice recipients of the surveys, individuals registered for the events, experts, online / onsite events attendees, newsletter subscribers and contact details of National Units Representatives.</p>
9	<p>Description of personal data categories</p> <p>a) Categories of personal data:</p> <p><input checked="" type="checkbox"/> personal identification numbers (IDs, passport, etc)</p> <p><input checked="" type="checkbox"/> data subjects' contact details (names and addresses (including email addresses))</p> <p><input checked="" type="checkbox"/> registration data/participation to meeting, etc</p> <p><input checked="" type="checkbox"/> physical characteristics of persons: image, voice, video recording, etc</p> <p>Images and / or sound data of the participants who take part in the onsite events conducted in the scope of activities of Eurydice may be collected. Speakers and participants who take part in online events may voluntarily submit or share their image and voice during the online events, in videoconferencing, audio calls, video recordings. Image and / or sound data of the experts who are interviewed and/or who share their best practices are collected.</p> <p><input type="checkbox"/> info concerning the data subject's private sphere and family</p> <p><input checked="" type="checkbox"/> allowances and bank accounts</p> <p>Participants may take part in onsite events in their own country or in another one. They may submit information for the purpose of participating in such initiatives. To be able to be reimbursed for travel, accommodation and for subsistence costs and events badges for onsite activities, information on itineraries and travel, receipts need to be collected.</p> <p><input type="checkbox"/> info on recruitment and contracts</p> <p><input checked="" type="checkbox"/> info concerning the data subject's career</p>

	<div data-bbox="292 203 1313 595"> <input type="checkbox"/> data subjects' leave and absences <input checked="" type="checkbox"/> data subjects' missions and journeys <input type="checkbox"/> data subjects' social security and pensions <input type="checkbox"/> data subjects' expenses and benefits <input checked="" type="checkbox"/> data subjects' communications via phone, emails etc <input checked="" type="checkbox"/> geo/localisation, IP address, etc <input type="checkbox"/> Other: please specify: <ul style="list-style-type: none"> Data subjects may share their signature when signing the list of participants in physical events.) </div> <div data-bbox="292 624 1228 656"> <p>b) Categories of personal data processing likely to present <u>specific risks</u>:</p> </div> <div data-bbox="292 669 1366 808"> <input type="checkbox"/> data relating to suspected offences, offences, criminal convictions or security measures <input type="checkbox"/> data being used to evaluate personal aspects of the data subject (ability, efficiency, conduct) </div> <div data-bbox="292 840 1361 902"> <p>c) Categories of personal data whose processing is <u>prohibited</u>, with exceptions (art. 10):</p> </div> <div data-bbox="292 916 1323 1229"> <input type="checkbox"/> revealing racial or ethnic origin <input type="checkbox"/> revealing political opinions <input type="checkbox"/> revealing religious or philosophical beliefs <input type="checkbox"/> revealing trade-union membership <input checked="" type="checkbox"/> concerning health: data relating to food allergies and accessibility to buildings <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 </div> <div data-bbox="292 1272 1248 1335"> <p>d) Specify any additional data or explanatory information on the data being processed, if any: N/A</p> </div>
10	<div data-bbox="292 1368 1005 1400" style="background-color: #f8d7da; padding: 2px;"> Retention time (time limit for keeping the personal data) </div> <div data-bbox="292 1431 1391 1615"> <p>A. For the National Units registered on Eurydice, their contact details are kept for three years. After these three years, these contacts details will be erased. 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 or X) may be stored and processed by that third party. Such processing does not fall within the scope of this Record and is therefore not affected by the erasure.</p> </div> <div data-bbox="292 1646 1391 1709"> <p>B. Regarding certain data processing activities carried out in relation to the Eurydice, specific data retention periods apply. Concretely:</p> </div> <div data-bbox="389 1740 1391 1998"> <ul style="list-style-type: none"> Personal data regarding dietary/access requirements of the participants in onsite events are deleted promptly at the conclusion of the event concerned. Up to six months: <ul style="list-style-type: none"> For, personal data collected on the MS Teams, the Identification data is stored for as long as the member's account is active. The retention period for content data in MS Teams and any personal data included therein is up to 180 days upon expiration / termination of the subscription. </div>

	<p>Diagnostic data is kept for up to 5 years upon expiration / termination of the subscription.</p> <ul style="list-style-type: none"> • Maximum of two years after the end the current service contract, including the periods of extension: <ul style="list-style-type: none"> ○ Personal data collected through the EUSurvey/MS Forms tool for registration to events. ○ Personal data collected for the purposes of producing videos, podcasts and photos of interviewees are only used in information / publicity materials produced. <p>Personal data related to the organisation and management of the events or webinars (this includes the information given during the registration, prior, during or after the event or webinar) as well as live-streaming and audio-visual recordings of events or webinars, for the purpose of sharing further information with the participants on future related events or webinars.</p> <ul style="list-style-type: none"> • Five years: <ul style="list-style-type: none"> ○ Personal data (first name, last name, job position, organisation, country of residence, e-mail address) of persons, who will register to receive the Eurydice Newsletters, will be kept for five years after registering to the Newsletter. For subscribers it counts from the last subscription date or last change in his/her subscription. It is important to note that receiving a newsletter or a notification item is not considered an “interaction” for this purpose. • Ten years: <ul style="list-style-type: none"> ○ Personal data concerning contractual aspects, payments, activities and missions and journeys to comply with the audit / accounting obligations of the responsible data processors. <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, the further retention time is: N/A</p>
11	<p>Recipients of the data</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"> • Authorised staff of the European Commission (such as DG EAC, DG CNECT (processor for the use of Newsroom) and DG DIGIT (DG DIGIT acting as processor for EACEA and its contractor (Microsoft) for the use of TEAMS (see Privacy Statement for M365); other EU institutions and bodies) • Authorised staff of OECD. EACEA, on behalf of the Eurydice network, performs every year two studies in collaboration with the OECD Office in Paris and its dedicated network on education policies. The collaboration entitles that every year one organisation is leading on the development of the study and the interaction with the representatives of both networks. In order to allow the interaction with the network, members contact details are shared and exchanged. • Authorised staff of the EACEA contractors acting as processors: WESTPOLE Belgium NV, Capgemini, ARHS Developments, European Service Network SA (ESN), Ecorys Europe EEIG – GEIE that abide by contractual confidentiality requirements. • Relevant staff of National Units, members (e.g. beneficiaries, etc) of the related MS TEAMS community, etc. • Other participants of the event based on consent for sharing participants’ list • Public access for data published on National Policy Platforms website and/or on the social media of Eurydice (Facebook) and/or DG EAC (X, Facebook, etc). • General public accessing videos/testimonials published on the Eurydice website.

	<ul style="list-style-type: none"> The following third-party tools and services are used: e.g. Facebook, X with their applicable privacy statement. <p>Online audience interaction tool (SLIDO) in accordance with its privacy policy which can be found here: https://ec.europa.eu/dpo-register/detail/DPR-EC-06687. SLIDO users not willing to share their personal data with this tool can simply reply anonymously. As SLIDO was acquired by Cisco Systems, Inc., personal data may be transferred to Cisco.</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>Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards?</p> <p>The controller may transfer personal data to the same categories of recipients listed above in countries outside the EEA such as Albania, Bosnia and Herzegovina, Georgia, Moldova, Montenegro, the Republic of North Macedonia, Serbia, Switzerland, Turkey and Ukraine. The National Units part of the Eurydice Network will receive this data when necessary.</p> <p>The personal data is only transferred if required as part of the implementation of the activities</p> <p>These transfers are necessary because some grant beneficiaries from the Eurydice network are based outside the European Union (EU) or the European Economic Area (EEA).</p> <p>The transfer to Switzerland is based on the Adequacy Decision of the EC.</p> <p>In the context of the use of TEAMS and SLIDO, the adequacy decisions of the Commission with the U.S and for SLIDO also with the UK will apply. The use of SLIDO may indeed imply the possible transfer of your data to the U.S. and to the U.K. since SLIDO was acquired by CISCO.</p> <p>For the other countries the transfer will be based on derogations as per Article 50 of the Data Protection Regulation, namely:</p> <ul style="list-style-type: none"> - explicit consent of the data subject(s) - the transfer is necessary for important reasons of public interest and is based on Article 50(1)(d) of the Regulation as recognised in the following Union law as regards education: <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 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> <p>The information we collect 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>General description of the technical and organisational security measures</p> <p>The IT systems used by the Agency are the ones of the Commission and abide by the Commission's security guidelines. The Agency is bound by the Commission Decision (EU,</p>

	<p>Euratom) 2017/46 of 10 January 2017 on the security of communication and information systems in the European Commission.</p> <p>1. Organisational measures:</p> <p>A Corporate Local Informatics Security Officer (C-LISO) is in place. Its role includes supervising the Agency compliance with the relevant regulations, and the application of corporate security measures recommend by Digital Services Directorate (DG DIGIT).</p> <p>Organisational measures include appropriate access rights and access control. 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. The authorised persons list is regularly reviewed and updated as needed.</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 in line with the state of the art.</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> <p>Authentication and authorisation are enforced for all content: two factor authentication is implemented in sensitive areas. Furthermore, content type restrictions and content segregation are in place to mitigate data injection and data leak risks.</p> <p>Description related to the EHESO Newsletter: The newsletter uses the European Commission (EC) corporate tool (Newsroom) managed by DG CNECT, which abide to the European Commission's security directives and provisions for these kinds of servers and services. All the data is stored on the secure websites of the European Commission.</p> <p>The contractors have the following privacy statements</p> <ul style="list-style-type: none"> - EUROPEAN SERVICE NETWORK SA: Privacy statement ESN - ECORYS EUROPE EEIG – GEIE: Privacy Ecorys - WESTPOLE Belgium NV: Privacy Policy - WESTPOLE Belgium NV - Capgemini: Data Protection Policy Management And Governance Capgemini - ARHS Developments: Privacy Arhs Group - ARHS <p>It should be noted that only the data mentioned in this record is processed by the contractors.</p>
14	<p>Information to data subjects / Data Protection Notice (DPN)</p> <p>A Data Protection Notice (DPN) relevant to this data processing activity is available on Eurydice website: Welcome to Eurydice</p>