



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°

2023-04

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*
- 2. Compliance check and risk screening*

The ground for the record is (tick the relevant one):

- Regularisation 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*

External events	
1	Last update of this record (where applicable) Not applicable
2	Short description of the processing Processing of personal data in the framework of external events organised by the EACEA throughout different stages of grant evaluation and management, procurement, expert management as well as for participant satisfaction surveys. The present record covers standard processing made in most of the external events organised by EACEA or within the framework of its activities. Additional specifications on the processing can be included in each specific privacy statement relating to a specific event.

Part 1 - Article 31 Record	
3	Name of the Controller

	<p>Unit(s) and/or function of person acting on behalf of the Controller</p> <p>Controller: European Education, and Culture Executive Agency Head of Unit B4 Operational Support and Business Processes EACEA-B4@ec.europa.eu</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>In certain cases, the Agency might use a processor to process personal data on its behalf in order to organise and manage the event. Specific information will be provided in the specific privacy statement of the event.</p>
7	<p>Purpose of the processing</p> <p>EACEA organises and co-organises physical, hybrid and online meetings, conferences and events. These meetings and events are attended by EACEA staff members, Commission staff members, and by external participants inside and outside its premises. External events are part of the execution of European Commission policy objectives”.</p> <p>The organisation of events includes but is not limited to the following aims:</p> <ul style="list-style-type: none"> - Organising information days, kick-off meetings, coordination meetings with experts and other communication and outreach events; - Processing invitations and attendance lists; - Securing access to the premises of the event; - Event reporting including taking photos and audio/video recordings and their possible distribution and publication; - Event follow-up actions; - Communication purposes for processing contact details linked to current and future events; - Policy purposes; - Reimbursement of travel expenses; - Statistical and historical purposes.
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 checked="" 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 type="checkbox"/> Complainants, correspondents and enquirers</p> <p><input type="checkbox"/> Witnesses</p>

	<input checked="" type="checkbox"/> Beneficiaries <input checked="" type="checkbox"/> External experts <input type="checkbox"/> Contractors <input checked="" type="checkbox"/> Other, please specify: Participants in events organised by the Agency (i.e. other staff from other European Commission services, external speakers, trainees, external staff). Additional data subjects can be included in a privacy statement relating to a specific event.
9	<p>Description of personal data categories</p> <p>Indicate all 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 type="checkbox"/> in the form of personal identification numbers</p> <p><input checked="" 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 checked="" type="checkbox"/> concerning pay, allowances and bank accounts (in particular in case of reimbursement of costs linked to the participation in the event)</p> <p><input type="checkbox"/> concerning recruitment and contracts</p> <p><input type="checkbox"/> concerning the data subject's family</p> <p><input type="checkbox"/> concerning the data subject's career</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</p> <p><input checked="" type="checkbox"/> concerning names and addresses (including email addresses)</p> <p><input type="checkbox"/> Other: please specify: _____</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 type="checkbox"/> data being used to evaluate personal aspects of the data subject (ability, efficiency, conduct)</p> <p>c) Categories of personal data whose processing is <u>prohibited</u>, with exceptions (art. 10):</p> <p><input type="checkbox"/> revealing racial or ethnic origin</p> <p><input type="checkbox"/> revealing political opinions</p> <p><input type="checkbox"/> revealing religious or philosophical beliefs</p> <p><input type="checkbox"/> revealing trade-union membership</p> <p><input checked="" type="checkbox"/> concerning health</p>

	<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: Additional personal data processed can be included in a specific privacy statement relating to a specific event.
10	<p>Retention time (time limit for keeping the personal data)</p> <p>Audio-visual recordings and photos are retained for 2 years. Web-streamed videos are kept on the servers of the Commission for a period of 2 years. The SCIC record can be accessed via the following link: https://ec.europa.eu/dpo-register/detail/DPR-EC-00306.1.</p> <p>The retention period for pre-recorded videos of colleagues and the registration of data is aligned with that of audio-visual recordings, photos and web-streamed videos.</p> <p>Please note that the Commission is not responsible for the privacy policies or practices carried out by the people or organisations using the EU Survey application and service to create and publish a survey. All personal data collected within such a survey will be processed by, and under the responsibility of, the survey owner or the survey owner's organisation. The Unit in charge of the survey is the controller of the data, which should be retained no longer than for a period of 2 years.</p> <p>Individuals and organisations using EU Survey to organise a survey have the legal obligation to create and publish their own privacy statement when collecting personal data.</p> <p>As each type of event under this record is different in terms of organisation, participants, venue and scope, the specific DPN of the event may deviate from this retention period based on the needs of the controller.</p> <p>Is any further processing for historical, statistical or scientific purposes envisaged? <input checked="" type="checkbox"/> yes <input type="checkbox"/> no</p> <p>If yes, indicate the further retention time: in some cases, personal data can be transferred to DG COMM for archiving and permanent preservation purposes, under the following record: https://ec.europa.eu/dpo-register/detail/DPR-EC-00074.</p>
11	<p>Recipients of the data</p> <p>Within the Agency, the following recipients will have access to the personal data with different purposes:</p> <ul style="list-style-type: none"> - Authorised staff of EACEA Units responsible for the organisation and management of the event; - Authorised staff of EACEA B.4 and R.1 may access content, pictures and audio-visual material for subsequent communication purposes after the event. <p>Outside the Agency, the following possible recipients are:</p> <ul style="list-style-type: none"> - Authorised European Commission staff or of other institutions, agencies or bodies co-organising the event if relevant for the purpose of the organisation of the event; - Authorised European Commission staff for policy purposes; - Staff in the DG HR Security Directorate for the access to the buildings; - Staff of external contractors, if required for organisational purposes (such as event management organisations, catering services that may handle data relevant to meal/dietary preferences; travel agency that may handle travel/accommodation relevant data). - Third-party platform providers authorised by DG DIGIT. (i.e.: Skype for business, Microsoft TEAMS, Webex, Slido, the webstreaming services of the EC, etc). <p style="text-align: center;">○ Privacy statement of EU Survey:</p>

	<p>https://ec.europa.eu/eusurvey/home/privacystatement</p> <ul style="list-style-type: none"> ○ Record of MS TEAMS: https://ec.europa.eu/dpo-register/detail/DPR-EC-04966 ○ Record of Webex: https://ec.europa.eu/dpo-register/detail/DPR-EC-05006.3 ○ Record of Slido: https://ec.europa.eu/dpo-register/detail/DPR-EC-06687 ○ Record of SCIC: https://ec.europa.eu/dpo-register/detail/DPR-EC-00306.1 <ul style="list-style-type: none"> - When applicable, external tools/platforms used by external contractors of EACEA. Their privacy policy will be shared in the corresponding privacy statement of the event. - When applicable, the general public may have access to the recording/photos of events if this is published on the Internet. <p>Additional recipients and specific information about them can be included in a privacy statement relating to a specific event.</p> <p>In addition, in case of control or dispute, 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; - EU courts and 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>In order to deliver online/hybrid events, Webex and/or Microsoft TEAMS may be used which might transfer personal data outside the EU in accordance with their privacy policy (see links to the respective records under point 11 above (recipients). Such transfer will be made based on standard contractual clauses as part of a contract between the service provider and the European Commission.</p> <p>Other than that, in principle, the EACEA does not transfer personal data to a third country or to an international organisation unless specific information is provided in the event-specific DPN.</p>
13	<p>General 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>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 security measures recommend by DG 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</p>

	<p>cases.</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>A Data Protection Notice will be provided by the Agency (or its processor, if any) to the participants before the event in an appropriate manner (e.g. through the registration form, or on the EACEA's website or the event's webpage).</p>