



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°

2023-09

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 Networks Platform	
1	Last update of this record (where applicable)
2	Short description of the processing
	<p>Erasmus Networks Platform (referred here as 'the Platform') is a network site based on the Europa Communities Platform Software as a Service (ECP SaaS)¹ based on <i>Open Social</i> - a third party solution managed and hosted by DG DIGIT (European Commission)- which is a ready-to-use Drupal Content Management System with standard functionalities to create and manage external network platforms under <i>europa.eu</i>.</p> <p>The platform aims to facilitate transnational cooperation among networks supporting the</p>

	<p>Erasmus+ Programme. The platform will play a central role to support lively and committed communities of practice in the sector of education. External contractors will provide support to the activities and projects of the networks, helping the platform members to develop new interpersonal relationships, to network and exchange knowledge as well as good practices. It will provide both a members-only networks supporting these communities and their activities, as well as a public facing web presence to promote the outcomes and results of the networks to a wider audience. Personal data is processed to allow interested individuals to create user accounts and consequently use the different functionalities of the platform (e.g., upload or download information or documents, make announcements, participate in networking activities, attend online and in-person events, subscribe to newsletters, share user experiences and add details to their profiles, for instance to find partners for collaboration.</p> <p>Additional information on the processing of personal data occurring within each specific network is available in the data protection record of the corresponding network.</p>
Part 1 - Article 31 Record	
3	<p>Name of the Controller Unit(s) and/or function of person acting on behalf of the Controller</p> <p>Controller: European Education and Culture Executive Agency (EACEA) Avenue du Bourget 1, BE-1049 Brussels Head of Department A - Erasmus+, EU Solidarity Corps EACEA-A@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>Non applicable</p>
6	<p>Name and contact details of processor (where applicable)</p> <p>The EU Commission Directorate-General for informatics (DG DIGIT) provides the IT hosting service for the platform.</p>
7	<p>Purpose of the processing</p> <p>The purpose of the processing is to support the networks of the Erasmus+ Programme, including to facilitate peer learning, mentoring, acceleration, exchange and knowledge-building activities, as well as providing information about the network and its events/activities. The platform aims to facilitate transnational cooperation among various national networks supporting the implementation of Erasmus actions, to upgrade their skills and tools, to raise their capacity to support different target groups for example by sharing best practices.</p> <p>The online web presence will foster the sharing of knowledge and experience, connect education stakeholders and stimulate collaboration.</p> <p>The communities of the networks will benefit from a web presence that will:</p> <ul style="list-style-type: none"> • Convey information on general policy and organisation of the initiative, on how to become active in the movement, and on upcoming events and news.

	<ul style="list-style-type: none"> • Feature a library of useful tools and knowledge such as reports and studies that can be leveraged by the communities. • Provide a collaborative online space where pedagogical experts, professionals of education and stakeholders can upload information and participate in discussions. • The general content of the web presence and the pledges or other forms of commitment will be publicly accessible; only registered members will be able to participate in discussions, collaborate over relevant topics, co-create content, submit studies, reports and other forms of knowledge sharing • The personal data is processed to implement the activities of the Communities of the Erasmus+ Programme including: <ul style="list-style-type: none"> • Set up and manage the members' accounts. • Protect the platform against malicious activities. • Assure quality of the online content (e.g., monitoring and validation of publications on the platform). • Organise and manage online and on-site or hybrid events (including live streaming, videos and recording of events). • Inform & communicate with Network members by means of newsletters. • Allow interaction and networking among the members of the Networks of the Erasmus+ Programme. • Identify new user needs and improve the quality/functioning of the platform. • Public content of the platform is freely accessible, no registration required. • Personal data accessible within the public version • populate this part • No personal data are accessible within the public version. • Personal data accessible once logged in (in other words, everyone can see personal data that individuals fill in/submit) • The platform has the technical capability to administer and add/remove details of the User Profile to better fulfil the purpose of the network, in full respect of data protection principles (in particular data minimisation), therefore other personal data such as, but not limited to, might be made available to the Platform's users and therefore, processed: <ul style="list-style-type: none"> • Name • Email • Country • Nationality • Organization • Profile image • Job title/position with the Organization • Spoken languages
8	<p>Description of the categories of data subjects</p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> EACEA & Commission staff (Contractual and temporary staff and functionaries servants in active position) <input checked="" type="checkbox"/> Contractors providing services Applicants

	<p>Beneficiaries</p> <p>Complainants, correspondents and enquirers</p> <p><input checked="" type="checkbox"/> Other, please specify:</p> <p>Members of the platform: in principle anyone can register on the platform. It mostly targets all Erasmus+ Programme (potential) applicants and beneficiaries (from the sectors of higher education, school education, VET, sport as well as teaching & administrative staff, civil society activists. Furthermore members/staff of associations, non-governmental organisations, enterprises, academic and professional associations, student associations, professional organisations, research institutions, vocational training institutions and any other participant or stakeholder eligible under the Erasmus+ programme.</p>
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"/> <i>in the form of personal identification numbers</i></p> <p><input type="checkbox"/> <i>concerning the physical characteristics of persons as well as the image, voice or fingerprints</i></p> <p><input type="checkbox"/> <i>concerning the data subject's private sphere</i></p> <p><input type="checkbox"/> <i>concerning the data subject's career</i></p> <p><input checked="" type="checkbox"/> Other: please specify:</p> <p>Additional personal data can be provided voluntarily by the members during events, in the blog function, in the commenting section of the private groups of the networks, with a view of enhancing one's networking and collaboration such as, but not limited to, might be made available by the Platform's users:</p> <ul style="list-style-type: none"> • Name • Email • Country • Nationality • Organization • Profile image • Job title/position with the Organization • Spoken languages <p>b) Categories of personal data processing likely to present <u>specific risks</u>:</p> <p><input type="checkbox"/> <i>data relating to suspected offences, offences, criminal convictions or security measures</i></p> <p><input type="checkbox"/> <i>data being used to evaluate personal aspects of the data subject (ability, efficiency, conduct)</i></p> <p>c) Categories of personal data whose processing is <u>prohibited</u>, with exceptions (art. 10):</p> <p><input type="checkbox"/> <i>revealing racial or ethnic origin</i></p> <p><input type="checkbox"/> <i>revealing political opinions</i></p> <p><input type="checkbox"/> <i>revealing religious or philosophical beliefs</i></p>

	<input type="checkbox"/> <i>revealing trade-union membership</i> <input type="checkbox"/> <i>concerning health</i> <input type="checkbox"/> <i>genetic data, biometric data for the purpose of uniquely identifying a natural person</i> <input type="checkbox"/> <i>concerning sex life or sexual orientation</i> d) Specify any additional data or explanatory information on the data being processed, if any: Non-Applicable
10	Retention time (time limit for keeping the personal data) Indicate the period of storage: The personal data is kept on the platform for the duration of their activities. 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 anew as members. Any further processing is described in the corresponding record of the network with the applicable retentions periods as defined in the DPN (data protection notice) and record of each specific network. Is any further processing for historical, statistical or scientific purposes envisaged? <input checked="" type="checkbox"/> No
11	Recipients of the data <ul style="list-style-type: none"> • Authorized staff of EACEA and DG EAC and other Partner DGs who are involved in the Erasmus+ Programme • Contractors of the Networks • Registered members • General public (but limited to the public website information and publications) • 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: <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 Details and additional recipients specific to a given platform will be defined in the data protection record of the specific network.
12	Are there any transfers of personal data to third countries or international

	<p>organisations? If so, to which ones and with which safeguards?</p> <p>Not applicable.</p> <p>In case of special case under a specific network should occur, this will be defined in the data protection record of the specific network.</p>
13	<p>General description of the technical and organisational security measures</p> <p>Erasmus Networks Platform (referred here as 'the Platform') is a network site based on the Europa Communities Platform Software as a Service (ECP SaaS) based on Open Social - a DIGIT proposed third party solution - which is a ready-to-use Drupal Content Management System with standard functionalities to create and manage external communities websites under europa.eu.</p> <p>The platform servers are hosted on Amazon Web Services in European Data Centres.</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. Organizational measures:</p> <p>A Corporate Local Informatics Security Officer (C-LISO) is in place. Their role includes supervising the Agency compliance with the relevant regulations, and the application of security measures recommend by DIGIT.</p> <p>Organizational 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 authorizations where the person granting the access is different from the person requesting or authorizing the access - except in limited cases of delegation. The person responsible person for 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>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 will be informed about the processing of their data, with the data protection notice being published/made available on the homepage (footer) of the platform.</p> <p>At specific network level, data subjects will have access to their DPN at the specific landing page and as appropriate as part of the organisation of the activities.</p>