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°

08 – 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):

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.

Publication of visual organisation charts on the Europa webpages of Commission services and on the intranet of EACEA			
1	Last update of this record (where applicable)		
	N/A		
2	Short description of the processing		
	Publication of a visual organisation chart of the European and Culture Executive Agency (EACEA) – including personal data such as a photograph, first name, surname, job title and function of the data subjects – on the Europa website (external) and EACEA intranet (internal).		
	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) Unit: Head of Unit EACEA.R1 People, Workplace and Communication
	EACEA-COMMUNICATION@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)
	N/A
7	Purpose of the processing
	Visual organisation charts are an important tool for internal and external communication. The visual presentation immediately conveys both the structure of a service and the way in which the various entities composing it operate together.
	The European Commission's Directorate-General for Human Resources and Security has developed a new, harmonised design for the presentation of organisation charts. In line with the Commission's visual identity, which applies to the institution as a whole (including EACEA), harmonisation of the organisation charts will provide a clear and coherent visual representation of all Commission services. The harmonised organisation charts will convey the collegiality of the Commission services, allowing European citizens who visit the Europa website to identify at a glance that the service is part of the European Commission. The harmonised templates have a common framework, but will nevertheless cater for the individual nature of each DG and Agency.
	The processing operations on personal data, linked to the publication of the visual organisation charts of the services, departments and executive agencies of the European Commission, are necessary for the management and functioning of the Commission and executive agencies, as mandated by the Treaties. Those provisions are, in particular, Article 11 of the Treaty on European Union and Article 15 of the Treaty on the Functioning of the European Union.
8	Description of the categories of data subjects
	Agency staff (Contractual and temporary staff in active position) Specifically: Director , Heads of Department , Heads of Unit , Deputy Heads of Unit . Also: Assistants to the Director (name only – no picture) .
	□ Visitors to the Agency
	Contractors providing goods or services
	Applicants
	Relatives of the data subject
	Complainants, correspondents and enquirers
	Witnesses
	Beneficiaries
	External experts

	☐ Other, please specify:
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 Specifically: pictures of the data subjects.
	concerning the data subject's private sphere
	concerning pay, allowances and bank accounts
	concerning recruitment and contracts
	C concerning the data subject's family
	C concerning the data subject's career Specifically: job title and function .
	concerning leave and absences
	☐ concerning missions and journeys
	concerning social security and pensions
	concerning expenses and medical benefits
	concerning telephone numbers and communications
	concerning names and addresses (including email addresses) Specifically: first name and surname.
	Other: please specify:
	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)
	<i>c)</i> Categories of personal data whose processing is <u>prohibited</u> , 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
	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)

	The data is retained for as long as the staff member is in one of the functions displayed on the visual organisation chart (i.e. Head of Unit, Director, etc.). If the staff member ceases to hold one of these functions, the staff member's personal data is removed from the publicly-available organisation chart (i.e. a new chart replaces it). However, after removal, the data is still retained for 5 years in accordance with the Commission Retention List section 12.3.6.
	Is any further processing for historical, statistical or scientific purposes envisaged?
11	Recipients of the data
	Any visitor to the Europa websites (external) or EACEA intranet (internal).
12	Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards?
	N/A
13	General description of the technical and organisational security measures
	1. Organisational measures
	Organisational measures that limit access to the personal data include restricted access rights and access control as follows. The data subjects send their picture, together with their consent, by email to the R1 Communication team. The R1 Communication team stores the picture on a dedicated electronic platform restricted to the Communication team (the U-drive). The U-drive is accessible only to members of the R1 Communication sector. Access is granted by the European Commission's IT service in DG DIGIT only if the request for access is supported by the Head of the R1 Communication sector.
	2. Technical measures
	The European Commission has implemented security measures to protect server hardware, software and the network from accidental or malicious manipulations and loss of data. All data is stored on European Commission servers managed by DG DIGIT in line with the technical security provisions laid down in the Commission Decision (EU, Euratom) 2017/46 of 10 January 2017 on the security of communication and information systems in the European Commission, its subsequent versions, its implementing rules (as adapted from time to time) and the corresponding security standards and guidelines, as well as the Commission Decision (EU, Euratom) 2015/443 of 13 March 2015 on the security in the Commission, and the Commission Decision (EU, Euratom) 2015/444 of 13 March 2015 on the security rules for protecting EU classified information, its implementing rules and the corresponding security notices. These documents (as adapted from time to time) are available for consultation at the following address: https://ec.europa.eu/info/publications/security-standards-applying-all-european-commission-information-systems_en .
	These security measures apply equally to EACEA.
14	Information to data subjects / Privacy Statement
	The information on processing is made available to the data subjects by means of a privacy statement published on the EACEA intranet and emailed to the data subjects.
	https://myintracomm.ec.europa.eu/dg/eacea/eacea/about/Pages/organisation-chart.aspx