



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°

03-2023

In accordance with Article 31 of Regulation 2018/1725, individuals whose personal data are processed by the European Education and Culture Executive Agency ("EACEA") in any context whatsoever are to be protected with regard to the processing of personal data and the EACEA 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 EACEA, 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.*

Insurance services for European Solidarity Corps volunteers	
1	Last update of this record (where applicable)
	N/A
2	Short description of various processing's
	<p>The EACEA is responsible for the management of the insurance service contract for European Solidarity Corps volunteers.</p> <p>The personal data of the volunteers are processed to enable their participation in the actions and are sent to the contractor in charge of providing insurance coverage to the volunteers.</p> <p>The EACEA receives and processes regular e-mails from the different stakeholders, and it monitors the execution of the contracts via monthly and annual lists of enrolled volunteers and</p>

	<p>participants. The monthly enrolment lists are shared with DG EAC, with the Head of Unit and the Head of Sector in EACEA.A5, as well as the Heads of EU Delegations. EU Delegations may organise local events with volunteers and/or are consulted by EACEA and the Commission in case the safety and security of volunteers are at risk.</p>
Part 1 - Article 31 Record (this part may be public)	
3	<p>Name of the Controller Unit(s) and/or function of person acting on behalf of the Controller</p> <p>European Education and Culture Executive Agency (EACEA).</p> <p>Persons designated as being in charge of the processing operation:</p> <ul style="list-style-type: none"> ○ Head of Unit A.5 Youth, EU Solidarity Corps and Aid Volunteers European Education and Culture Executive Agency <p>Email address for the insurance for European Solidarity Corps volunteers: EACEA-SOLIDARITY-CORPS@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</p> <p>HENNER SAS 14 boulevard du Général Leclerc 92200 Neuilly-sur-Seine Email: dpo@henner.com</p>
7	<p>Purpose of the processing</p> <p>Data processing is necessary for the following purposes:</p> <ol style="list-style-type: none"> 1. To ensure the provision of insurance services to European Solidarity Corps volunteers during their participation in the activities organised following grant agreements or grant decisions in line with the related Programmes' legal basis. 2. Regarding the insurance contract for European Solidarity Corps participants, the monthly lists of insured volunteers may be analysed by DG EAC and/or the National Agencies. National Agencies use the lists to organise, for example, training events with volunteers before departure or meetings after return from a volunteering activity. 3. Regarding the insurance contract for volunteering in third countries, DG EAC sends information to Heads of EU Delegations in order to give them updated information on the volunteers deployed in each third country. EU Delegations may organise local events with volunteers or be requested by EACEA/DG EAC for support in case the safety and security of a volunteer is at risk.
8	<p>Description of the categories of data subjects</p> <p>Whose personal data are being processed?</p>

	<p>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 type="checkbox"/> EACEA staff (Contractual and temporary staff in active position)</p> <p><input type="checkbox"/> Visitors to the EACEA</p> <p><input type="checkbox"/> Contractors providing goods or services</p> <p><input 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> <p><input checked="" type="checkbox"/> Beneficiaries</p> <p><input type="checkbox"/> External experts</p> <p><input type="checkbox"/> Contractors</p> <p><input checked="" type="checkbox"/> Other, please specify: <i>European Solidarity Corps volunteers</i></p>
9	<p>Description of personal data categories</p>
	<p>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):</p> <p>a) Categories of personal data:</p> <p><input checked="" type="checkbox"/> in the form of personal identification numbers</p> <p><input type="checkbox"/> concerning the physical characteristics of persons as well as the image, voice or fingerprints</p> <p><input checked="" type="checkbox"/> concerning the data subject's private sphere (optional)</p> <p><input checked="" type="checkbox"/> concerning pay, allowances and bank accounts</p> <p><input type="checkbox"/> concerning recruitment and contracts</p> <p><input checked="" type="checkbox"/> concerning the data subject's family</p> <p><input checked="" type="checkbox"/> concerning the data subject's career</p> <p><input type="checkbox"/> concerning leave and absences</p> <p><input checked="" type="checkbox"/> concerning missions and journeys</p> <p><input type="checkbox"/> concerning social security and pensions</p> <p><input checked="" 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>

	<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 <p>Personal data concerning health of the insured individuals may be submitted and processed, for example, when a volunteer reaches out to a stakeholder (e.g. the insurance service provider, the beneficiary organisation, National Agency) seeking support.</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 <p>d) Specify any additional data or explanatory information on the data being processed, if any:</p> <p>N/A</p>
10	<p>Retention time (time limit for keeping the personal data)</p> <p>Indicate the period of storage:</p> <ul style="list-style-type: none"> • 10 years after the closure of the insurance contract for contractual matters (legal basis) <p>Is any further processing for historical, statistical or scientific purposes envisaged? <input type="checkbox"/> yes <input checked="" type="checkbox"/> no</p>
11	<p>Recipients of the data</p> <p>Access to personal data may be given on a need-to know basis to the following recipients:</p> <ul style="list-style-type: none"> • Designated staff of the European Commission in particular, Directorate General Education and Culture (DG EAC) for the insurance contract for European Solidarity Corps volunteers • The Heads of EU Delegations in countries where volunteering activities take place • Designated staff of EACEA; • Authorised staff of the contractor of the Service contract n° SI2.1156077 (insurance contract for European Solidarity Corps participants): Henner as the leader of the group together with the members AXA France VIE and Inter Partner Assistance • Henner's subcontractors and partners : <ul style="list-style-type: none"> – Outside bodies responsible for the fulfilment of the contracts and the management of the coverage: insurers, reinsurers, healthcare providers, partners, etc.; – Any person who is a party to or concerned by the contract (assignees, beneficiaries, subscribers, etc.); – Henner's subcontractors/suppliers for any operation linked to Henner's activity and solely within the limit necessary for the performance of the tasks which are entrusted to them, such as : <ul style="list-style-type: none"> ○ Inter Mutuelles Assistance (IMA), Assistance company based in France, ensuring the back-up of our Client Service Teams to answer phone calls and issue urgent letters of guarantee outside Henner offices opening hours. <p>Henner's IT partners:</p> <ul style="list-style-type: none"> – CHEOPS, host of Hennernet administration system – CLARANET, host of IS infrastructure/websites – AVAYA – telephone system

	<ul style="list-style-type: none"> – RING Central – email tool • Bodies liable to intervene in the insurance activity, such as public bodies, inspectors, investigators, experts, auditors, court officers, public officers and public bodies authorised to receive them, arbitrators, mediators or supervisory authorities, or professional organisations, in their capacity as persons or entities benefiting from a right of communication. <p>The transfer of data to other third parties is prohibited. Personal data collected will never be used for marketing purposes.</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>N/A</p>
13	<p>General description of the technical and organisational security measures</p> <p>The European Commission’s IT systems used by the EACEA abide by the Commission's security guidelines. The EACEA 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 EACEA compliance with the relevant regulations, and the application of security measures recommend by DIGIT.</p> <p>Organisational measures include appropriate access rights and access control. As a rule within the EACEA, 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 EACEA staff are bound by a confidentiality obligation. The need to know principle applies in all cases. Secure e-mail connections (between the contractor and EACEA) via password-protected folders and files are in place.</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> <p>The servers used by EACEA are located in Luxembourg.</p>

	For insurance coverage processing, Henner processes the data in an ISO/IEC 27001:2013 certified environment – both organizational and technical. The servers of Henner are located at data centres in France and are not cloud based.
14	<p>Information to data subjects / Privacy Statement</p> <p>For European Solidarity Corps volunteers, information about the data subject and the data protection notice is permanently available on following website: https://youth.europa.eu/solidarity/young-people/training-support_en and https://europa.eu/youth/privacy_en (See section <i>Insurance</i> of the privacy statement of the European Youth Portal)</p>