



## 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°

06-2023

*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.*

DiscoverEU	
1	<b>Last update of this record (where applicable)</b> N/A
2	<b>Short description of the processing</b>  Personal data is processed to organise and manage the travel passes of the DiscoverEU participants. Applicants submit personal data in the European Youth Portal. The data is transferred to the contractor in charge of booking the trips and providing support for the selected participants.  DG EAC and EACEA launch rounds of applications to distribute the travel passes (approx. 1 to 3 per year).  DG EAC is in charge of the European Youth Portal, where applicants apply to the DiscoverEU rounds. EACEA selects the awarded participants in the European

	<p>Youth Portal and manages, via a contractor, the distribution of the travel passes to them. Processing of personal data via the European Youth Portal is covered by the Record DPR-EC-00371.2 published in the public register of the DPO of the European Commission (available <a href="#">here</a>).</p> <p>The present data protection record covers processing of personal data by EACEA and its contractor once the data has left the European Youth Portal.</p> <p>More detailed information under Part 2 of this Record.</p>
<b>Part 1 - Article 31 Record</b>	
3	<p><b>Name of the Controller</b> <b>Unit(s) and/or function of person acting on behalf of the Controller</b></p> <p>Controller: European Education and Culture Executive Agency (hereafter EACEA) Unit(s): A5: Youth, EU Solidarity Corps and Aid Volunteers Email address: EACEA-A5@ec.europa.eu</p>
4	<p><b>Contact details of the Data Protection Officer (DPO)</b></p> <p>EACEA-data-protection@ec.europa.eu</p>
5	<p><b>Name and contact details of joint controller (where applicable)</b></p> <p>The European Commission, Directorate-General for Education, Youth, Sport and Culture (hereafter DG EAC) Unit B3: Youth, Volunteer Solidarity and Traineeships Office Email address: <a href="mailto:EAC-DATA-PROTECTION-COORDINATOR@ec.europa.eu">EAC-DATA-PROTECTION-COORDINATOR@ec.europa.eu</a></p>
6	<p><b>Name and contact details of processor (where applicable)</b></p> <p>Contractor:</p> <ul style="list-style-type: none"> <li>- Consortium member Eurail B.V. Statutory registration number: 30206952 Leidseveer 10 NL-3511 SB Utrecht, Netherlands</li> <li>- Consortium member MCI Benelux S.A. Statutory registration number: 0480076556 Boulevard du Souverain 280 B-1160 Brussels, Belgium</li> </ul>
7	<p><b>Purpose of the processing</b></p> <ul style="list-style-type: none"> <li>• Organise selections and award of DiscoverEU travel passes and related services: launching rounds on the European Youth Portal inviting applicants to reply to a questionnaire. On this occasion, applicants must submit certain personal data in order to allow the joint controllers to assess if they meet the eligibility conditions. Participants are selected if they meet the eligibility conditions, if they correctly answer the Quiz questions and if they answer in the most correct way the subsidiary question (tiebreaker).</li> <li>• Once selected, the contractor verifies the actual eligibility of the selected</li> </ul>

	<p>candidates by checking the validity of personal documents (proof of nationality, proof of legal residence).</p> <ul style="list-style-type: none"> <li>• After this, the travel pass and the accompanying discount card are awarded to participants by the contractor. Participants using the pass are in contact with the contractor to prepare their travel and in case they need support to use the pass.</li> <li>• Booking train, coach or plane tickets for applicant awarded a DiscoverEU travel pass</li> <li>• Monitoring and reporting: EACEA can also process personal data of participants for monitoring and reporting purposes.</li> </ul> <p>The European Commission, EACEA and the contractor will not process the collected personal data for any other purpose than those described above.</p>
8	<p><b>Description of the categories of data subjects</b></p> <p>Whose personal data are being processed?</p> <p><input type="checkbox"/> Agency staff (Contractual and temporary staff in active position)</p> <p><input type="checkbox"/> Visitors to the Agency</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 checked="" type="checkbox"/> Complainants, correspondents, and enquirers</p> <p><input type="checkbox"/> Witnesses</p> <p><input 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: DiscoverEU candidates and selected candidates.</p>
9	<p><b>Description of personal data categories</b></p> <p><b>a) Categories of personal data:</b></p> <p><input checked="" type="checkbox"/> in the form of personal identification numbers (ID card number or passport number or legal residence number)</p> <p><input checked="" type="checkbox"/> concerning the physical characteristics of persons as well as the image, voice or fingerprints (ID card picture or passport picture or legal residence picture)</p> <p><input checked="" type="checkbox"/> concerning the data subject's private sphere (nationality, legal residence, date of birth, email address, first name, last name, gender (optional), region of residence (optional) telephone number, occupation (e.g. schooling, employment...), disability or health problem (optional and with request to specify need for specific related support), country issuing the national ID card / passport / legal residence proof.</p> <p><input checked="" type="checkbox"/> concerning pay, allowances and bank accounts (source to finance non covered costs)</p> <p><input type="checkbox"/> concerning recruitment and contracts</p> <p><input checked="" type="checkbox"/> concerning the data subject's family (level of education of one the parents/legal</p>

	<p>guardians (optional))</p> <p><input checked="" type="checkbox"/> concerning the data subject's career (previous occupation (e.g. schooling, employment...), (previous) involvement in a youth organisation (optional)), envisaged future occupation (e.g. studies, work...)</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 (telephone number, email address)</p> <p><input checked="" type="checkbox"/> concerning names and addresses (including email addresses) (first name, last name, email address, national ID card / passport / legal residence proof, region of residence (optional)).</p> <p><input type="checkbox"/> Other</p> <p><b>b) Categories of personal data processing likely to present <u>specific risks</u>:</b></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><b>c) Categories of personal data whose processing is <u>prohibited</u>, with exceptions (art. 10):</b></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 (optional in case the participant request specific support due to health condition)</p> <p><input type="checkbox"/> genetic data, biometric data for the purpose of uniquely identifying a natural person</p> <p><input type="checkbox"/> concerning sex life or sexual orientation</p> <p><b>d) Specify any additional data or explanatory information on the data being processed, if any:</b> N/A</p>
10	<p><b>Retention time (time limit for keeping the personal data)</b></p> <p>Personal data contained within <u>non-selected user applications</u> for DiscoverEU will be deleted two years after they submitted their application, unless they have expressed interest in being informed about / involved in other European Youth Portal services in which case the data is kept for maximum 5 years. After that time, their personal data will be anonymised and only be kept for statistical purpose.</p> <p>Personal data contained within selected user applications for DiscoverEU will be deleted 5 years from the travel booking date according to the common retention list unless the user has expressed his interest to withdraw from the 'selected user' status and has not benefited from EU funding through the initiative, in which case</p>

	<p>the data is kept for maximum 2 years.</p> <p><b>Is any further processing for historical, statistical or scientific purposes envisaged?</b>  <input checked="" type="checkbox"/> yes <input type="checkbox"/> no</p> <p><b>If yes, indicate the further retention time:</b>  Data used for statistical purposes after the retention period of 5 years are anonymised.</p>
11	<p><b>Recipients of the data</b></p> <ul style="list-style-type: none"> <li>- <i>Authorised staff of the European Education and Culture Executive Agency (based in EU)</i></li> <li>- <i>Authorised staff of the European Commission</i></li> <li>- <i>Authorised staff of the contractor and their subcontractors (based in EU/EEA countries)</i></li> </ul> <p>The contractor operates in DiscoverEU using services from the following third parties tools: Adobe Campaign &amp; Mandrill (e-mail confirmation)</p> <ul style="list-style-type: none"> <li>- AWS Cognito &amp; CommerceTools (account and order management)</li> <li>- AWS Dynamo DB (mobile pass)</li> <li>- Chatlayer (chatbot)</li> <li>- Dune (database)</li> <li>- Flexmail (e-mail system)</li> <li>- Insided (community)</li> <li>- Mailchimp &amp; IRIS/Intersystems (reservations)</li> <li>- MessageBird (SMS system)</li> <li>- Netigate (post-travel survey)</li> <li>- Shufti Pro (ID verification)</li> <li>- SQL Datawarehouse (archiving &amp; reporting)</li> <li>- Zendesk (helpdesk)</li> </ul> <ul style="list-style-type: none"> <li>- For a very limited number of cases (fix train tickets, exceptional bus or plane trips), limited personal data (name, first name, date of birth) is transferred to a travel agency based in Belgium, with whom the DiscoverEU contractor has a data protection agreement (DPA) in place. Depending on the itinerary requested by the participant, the travel agency may book trips to transport operators in countries in the EU/EEA or outside the EU/EEA that are part of DiscoverEU (North Macedonia, Serbia, Turkey). Such trips are always booked upon request of the participant.</li> </ul> <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"> <li>-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;</li> <li>-The European Anti-Fraud Office (OLAF);</li> <li>-The Internal Audit Service of the Commission</li> <li>-The Investigation and Disciplinary Office of the Commission (IDOC)</li> <li>-The European Court of Auditors</li> <li>-The European Ombudsman</li> <li>-The European Public Prosecutor's Office</li> </ul>

	-EU courts and national authorities
12	<p><b>Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards?</b></p> <p>Depending on the itinerary requested by the participant, the travel agency may book trips to transport operators in countries in the EU/EEA or outside the EU/EEA that are part of DiscoverEU (North Macedonia, Serbia, Turkey). Such trips are always booked upon request of the participant. Such transfer of personal data will be based on art 50.1.c (transfer necessary to implement a contract concluded in the interest of the data subjects).</p>
13	<p><b>General description of the technical and organisational security measures</b></p> <p><b>For the Agency</b></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 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 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> <p>Currently, the following is implemented:</p> <ul style="list-style-type: none"> <li>- Secure e-mail connections, encryption of personal data</li> <li>- Storage in password-protected folders and files</li> <li>- Folders and files accessible to authorized staff on a need-to-know basis</li> <li>- Data anonymised when processed for statistical purposes</li> <li>- The servers used by EACEA and DG EAC are located in Luxemburg.</li> <li>- The systems of the contractor are hosted on servers located in the EU. Personal data are also stored on EU servers.</li> <li>- Security measures are implemented by the European Commission's corporate technical services (DIGIT) in securing the EU Login platform and the EYP's dedicated authentication system, currently using the EC's Drupal hosting environment.</li> </ul>

	<p>Security measures are implemented by the European Commission's corporate technical services (DIGIT) in securing the EU Login platform and the EYP's dedicated authentication system, currently using the EC's Drupal hosting environment.</p> <p><b>For the contractor</b></p> <p>Secure e-mail connections, encryption of personal data  Storage in password-protected folders and files  Folders and files accessible to authorized staff on a need-to-know basis  Data anonymised when processed for statistical purposes</p> <p>The systems of the contractor are hosted on servers located in the EU. Personal data are also stored on EU servers.</p>
14	<p><b>Information to data subjects / Privacy Statement</b></p> <p>Data Protection Notice of the DiscoverEU:</p> <ul style="list-style-type: none"> <li>- is published on the European Youth Portal:  <a href="https://europa.eu/youth/privacy_en">https://europa.eu/youth/privacy_en</a></li> <li>- available on the application form for DiscoverEU</li> <li>- available on the contractor's website and APP: <a href="#">Privacy Policy – #DiscoverEU (start-discover.eu)</a></li> </ul>