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 nº	*01-2019*

In accordance with Article 31(1) 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(1) 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.*

eTwinning	
1	**Last update of this record (where applicable)**
	The last update of the former notification was made on 09/07/2019 (Ares(2019)4392477)
2	**Short description of the processing**
	eTwinning offers a platform for staff (teachers, head teachers, librarians, etc.), working in a school in one of the participating countries, to communicate, collaborate, develop projects, share and to be part of the eTwinning community.

eTwinning promotes school collaboration in Europe through the use of Information and Communication Technologies (ICT) by providing support, tools and services for schools. |

eTwinning also offers opportunities for free and continuing online Professional Development for educators.

Launched in 2005 as the main action of the European Commission's eLearning Programme, eTwinning is part of the Erasmus+, the European programme for Education, Training, Youth and Sport, since 2014.

Part 1 - Article 31 Record

3	**Name and/or function and contact details of controller**
	The European Education and Culture Executive Agency (EACEA), Avenue du Bourget 1, BE-1049 Brussels Head of Unit A6: Unit A6 - Platforms, Studies and Analysis Email: eacea-eplus-etwinning@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)**
	Not applicable.

6	**Name and contact details of processor** **(where applicable)**
	EUN Partnership AISBL (hereinafter called European Schoolnet) runs the eTwinning Central Support Service as a contractor of the European Education and Culture Executive Agency. Rue de Trèves, 61 (3rd floor) 1040 Brussels Belgium Tel: +32 2/790 75 75 Email: info@eun.org Website: www.eun.org In addition, Tremend Software Consulting SRL provides the digital services needed to manage and maintain eTwinning.net also as contractor of EACEA. 83 Cluj Stroot, bl. 8B, sc. 1, floor 7, ap.32 RO-030134 Bucuresti (Bucharest) Romania Tel: +40-21-223-7700 Email: hello@tremend.com Website: https://tremend.com/ The EU Commission Directorate-General for informatics (DG DIGIT) provides the IT hosting service for the eTwinning platform through Amazon Web Services.

7	**Purpose(s) of the processing**
	The eTwinning Platform allows users to submit information themselves in order to participate in eTwinning activities that include collaborative projects, professional development, teachers

networking, sharing of practice and other activities fully described in the various sections on the eTwinning portal.

The processing of data is necessary to:
- provide information about registrants' activities within and outside eTwinning to establish and maintain online community's activities;
- allow registrants to find partners and set up projects;
- provide information about their eTwinning projects;
- in general, allow eTwinning registrants to communicate and collaborate in the spirit of mutual trust and respect; and,
- allow and facilitate monitoring and research activities.

When users register in eTwinning they can also sign up for the eTwinning newsletters.
In order to validate the registration of the users, EACEA sends the registrants' data to their corresponding National Support Organisations (NSO). The NSO can also use these personal data to contact users for national eTwinning activities (national newsletters, participation in course, seminars and workshops) as described in the respective parts of the privacy statement.

Aggregated statistics are collected regularly, including but not limited to, the number of users during a specific period, the preferred subjects or countries chosen by teachers, account usage.

8	**Description of the categories of data subjects**

Whose personal data are being processed?

☐ EA staff (Contractual and temporary staff in active position)

☐ Visitors to the EA

☐ Contractors providing goods or services

☒ Applicants
Teachers/Educators of primary and secondary schools and School Principals

☐ Relatives of the data subject

☐ Complainants, correspondents and enquirers

☐ Witnesses

☐ Beneficiaries

☐ External experts

☐ Contractors

☐ Other, please specify:

9	**Description of personal data categories**

a) General 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

Participants may provide pictures of themselves, if they are further involved in eTwinning activities after their initial registration.

☒ concerning the data subject's private sphere

Information on the purpose of their participation in the eTwinning spaces (TwinSpaces, eTwinning Groups and online events) may be provided and can belong to their private sphere. Participants can also submit photos and other information in the context of the exchanges on the platform and can post messages and other material in forums, blogs and other sections of the platform.

☐ concerning pay, allowances and bank accounts

☐ concerning recruitment and contracts

☐ concerning the data subject's family

☒ concerning the data subject's career

To be part of the eTwinning spaces, participants may submit a list of projects and contacts in eTwinning Live. They may also share information about professional development and share practices.

☐ concerning leave and absences

☒ concerning missions and journeys

Participants may take part in events abroad. They may submit information for the purpose of participating in such initiatives.

☐ concerning social security and pensions

☐ concerning expenses and medical benefits

☐ concerning telephone numbers and communications

☒ concerning names and addresses (including email addresses)

To register in the platform, applicants must submit the following information:

Registrant data: username, name, surname, email address; role at school (if a teacher, the subjects taught), communication language(s), age range of pupils, user's description.

School data: information relating to a school such as the official school name, address, town, email address, region and country.

School Principal's data: name, surname, professional email address.

☐ 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)

c) Categories of personal data whose processing is prohibited, with exceptions (art. 10 new Regulation):

☐ 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)**
	Data related to the profile of the user are kept for a maximum of three years after the user's last login. After one year from the last login, the user profile will automatically be set to inactive, i.e., no longer visible to other users or the outside world. The user can re-activate her/his account by logging in again. A reminder is sent after two additional years informing the user that, 3 years after her/his last login the profile will be deactivated permanently. All personal information is then made anonymous.
	In order to deactivate or delete an account, users can contact the Central Support Service at: delete@etwinning.net.
	In case users request the deactivation of their profile or the profile is automatically deactivated, no data will be visible to other eTwinning users. Data will be kept only in an anonymous form that does not allow for personal identification. If users with a deactivated profile want to continue using the platform, they will need to register again. The data remain solely for research and monitoring purposes at the disposal of EACEA, the European Commission, national or regional school authorities, authorities in charge of implementing eTwinning (Central Support Service and National Support Organisations) and other third parties under the authorisation of the Data Controller in an aggregated format.
	Is any further processing for historical, statistical or scientific purposes envisaged? ☐ yes ☒ no
11	**Recipients of the data**
	The EACEA, DG EAC of the European Commission and the authorised staff of the contractors have access to the full set of data submitted by the users. - The national or regional school authorities in charge of implementing eTwinning in each of the participating countries (NSO) have access to the registrant data submitted on eTwinning.net in order to validate/manage their registration and certain activities. NSO have only access to the data of users of their respective countries. - The other eTwinning registered and validated users ("eTwinners"), upon login, have access to the full set of data except users' email address and school leader's data. Other data submitted by users on the eTwinning platform (e.g., messages in forums, online discussions and threads, files and pictures) are only visible to other registered users related to the area of the Portal where they have been uploaded (e.g., eTwinning Groups, Learning Lab, TwinSpace, Project Diary). Some data submitted by users will be displayed, only after having given their explicit consent, on the public area of the eTwinning Portal, which means that such data are freely accessible on the Internet. In this case the user has the right to delete their data. The data which becomes public

	is in particular the following: **Registrant data:** name, surname, belonging school. In case of eTwinning Ambassadors, also the picture of the user will be publicly displayed. **School data:** official school name, town, region, country. **Project data:** name, description, languages, age range of pupils, partner details, registration date and closing data (if available). The transfer of specific data to other third parties (e.g., research centres and universities) can be permitted under specific authorisation of the Data Controller, but data must be processed in an anonymous way.
12	**Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards?** Personal data relating to participants outside the EU are transferred to their respective NSO in third countries (as of February 2019: Algeria, Armenia, Azerbaijan, Georgia, Jordan, Lebanon, Moldova, Tunisia, and Ukraine). This list evolves over time. The reason for which we send the personal data to the third countries listed is to check the profiles of the participants and ensure that they can be registered. The processing of data with third countries is done on the basis of a grant agreement signed with these NSO which contains special clauses on data processing. Transfers of personal data into third countries: certain NSO are based outside the European Union or the European Economic Area in the following third countries: Albania, Algeria, Armenia, Azerbaijan, Georgia, Jordan, Lebanon, Moldova, Tunisia, Ukraine, Turkey, Serbia, Bosnia and Herzegovina and North Macedonia. Please note that for these countries, the EU has not adopted an adequacy decision pursuant to Article 47 of Regulation (EU) 2018/1725, hence certifying that your personal data once transferred, will benefit from an adequate level of protection in the third country of destination. Therefore, the level of protection of your personal data transferred will depend on the law or practice of that third country and, as a result, your rights as regards data protection might not be equivalent to those in and EU/EEA country or a country with an adequacy decision. However, the NSO is bound by data protection clauses, in particular with technical and organisational security obligations, under a grant agreements signed with the Agency. The users may request to obtain a copy of these clauses by contacting the controller. The Central Support Service is bound by data protection under a service contract signed with the Agency.
13	**General description of security measures** The collected personal data and all related information are stored on secured servers of the European Commission managed by DG DIGIT and is highly secured. Only authorised personnel have access to the storage media in the server. DG DIGIT adopts the security of the IT hosting service in conformance with the Commission's Information Security Policy and Framework and DIGIT's complementary Information Security Policy Framework. See also Commission Decision C(2006)3602 of 16 August 2006 concerning the "Security of information systems used by the European Commission" and "Implementing rules of 16.8.2006 concerning the security of information systems used by the European Commission". A contractual clause about data protection is included in the contract with the service providers, European Schoolnet and Tremend Software Consulting, to ensure that the personal data are processed in compliance with the applicable legislation. NSO that wish to process personal data for national activities access the information stored at central level.
14	**Specific Privacy Statement** https://www.etwinning.net/en/pub/privacy_policy.htm