



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°

10-2019

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.*

EACEA Web Contact Forms	
1	Last update of this record (where applicable) First version is 09 09 2019
2	Short description of the processing Web contact forms are made available on the EACEA website to allow web users to contact the Agency. The information submitted is submitted to the EACEA INFO functional mailbox accessible to EACEA B4, and automatically saved in a web database accessible only to the EACEA R1 Communication team and to DG DIGIT and DG COMM. From this database, the enquiries are automatically sent to the relevant functional mailbox, depending on the subject chosen in the drop down menu of the web contact form. Each form is automatically sent to the corresponding functional mailbox within the Agency and treated by the owners of that functional mailbox.

	<p>Queries submitted via the General Questions form are sent to the eacea-info@ec.europa.eu functional mailbox. Queries are also submitted directly to this functional mailbox by people who have previously had email exchanges with EACEA INFO. Following the initial submission via the contact form, correspondence takes place between the submitter of the query and the functional mailbox directly.</p> <p>This functional mailbox is managed by the EACEA B4 - 002 Business Processes & Data Intelligence team. A member of the team replies directly to most queries received. If the request concerns another area of work of the Agency, it will be forwarded to the relevant functional mailbox within EACEA.</p> <p>Groups of people wishing to visit EACEA premises can select 'Visits to the Agency' from the General Questions contact form to submit their request. Following a reply from the Agency, all follow-up correspondence between EACEA and the visiting group is then done via the EACEA VISITS functional mailbox, which is managed by the Communication sector of EACEA Unit R1.</p>
Part 1 - Article 31 Record	
4	<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 Head of Unit B4 – Operational Support and Business Processes Head of Unit R1 – People, Workplace and Communication (for the parts concerning the visits and the web database).</p> <p>EACEA-INFO@ec.europa.eu</p>
5	<p>Contact details of the Data Protection Officer (DPO)</p> <p>EACEA-data-protection@ec.europa.eu</p>
6	<p>Name and contact details of joint controller (where applicable)</p> <p>N/A</p>
7	<p>Name and contact details of processor (where applicable)</p> <p>N/A</p>
8	<p>Purpose of the processing</p> <p>To enable the public (visitors to our website) to contact EACEA directly with their queries (including requests to visit EACEA premises) and to respond to those queries as efficiently as possible. A request for feedback survey is also sent to the visitors after the visit.</p>
9	<p>Description of the categories of data subjects</p> <p>Whose personal data are being processed? 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"/> Agency staff (Contractual and temporary staff in active position)</p> <p><input checked="" type="checkbox"/> Visitors to the Agency</p>

	<input type="checkbox"/> Contractors providing goods or services <input type="checkbox"/> Applicants <input type="checkbox"/> Relatives of the data subject <input checked="" type="checkbox"/> Complainants, correspondents and enquirers <input type="checkbox"/> Witnesses <input type="checkbox"/> Beneficiaries <input type="checkbox"/> External experts <input type="checkbox"/> Contractors <input checked="" type="checkbox"/> Other: Visitors to the EACEA website
10	Description of personal data categories
	<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 checked="" type="checkbox"/> in the form of personal identification numbers</p> <p>Only for visitors. The Agency is required to generate V-passes for visitors to allow them to enter EACEA premises. For this, visitors are asked to provide their email address, surname, first name, date of birth, nationality, ID number, ID validity date and, if parking is required, their car ID. This information is not sent via the online webform; rather EACEA.R1 sends the visit requester an email at a later stage via the EACEA VISITS functional mailbox asking for this information to be entered in an Excel template and sent back to EACEA VISITS. This information is entered into the V-pass platform. The system automatically sends a notification to the visitor, who must indicate that they have read the privacy agreement linked to the platform (DPR-EC-00655).</p> <p><input type="checkbox"/> concerning the physical characteristics of persons as well as the image, voice or fingerprints</p> <p><input type="checkbox"/> concerning the data subject's private sphere</p> <p><input type="checkbox"/> concerning pay, allowances and bank accounts</p> <p><input type="checkbox"/> concerning recruitment and contracts</p> <p><input type="checkbox"/> concerning the data subject's family</p> <p><input checked="" type="checkbox"/> concerning the data subject's career</p> <p>The data subject can provide the name of their organisation. This is not obligatory.</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 type="checkbox"/> concerning telephone numbers and communications</p> <p><input checked="" type="checkbox"/> concerning names and addresses (including email addresses)</p> <p>The data subject must provide a name and an email address when submitting the webform on the EACEA website.</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> <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 type="checkbox"/> concerning health</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>d) Specify any additional data or explanatory information on the data being processed, if any: _____</p>
11	<p>Retention time (time limit for keeping the personal data)</p> <p>The personal data received by EACEA via the webforms or via email is kept for up to one year. Data collected in relation to visits to EACEA premises may be kept for up to five years, in line with the European Commission common retention list SEC(2019)900 point 9.3.</p> <p>Is any further processing for historical, statistical or scientific purposes envisaged?</p> <p><input type="checkbox"/> yes <input checked="" type="checkbox"/> no</p> <p>No. All processing is carried out within one year of receipt of the data.</p>
12	<p>Recipients of the data</p> <p>The personal data received can be accessed by EACEA B4 via their Functional Mailbox, and by the EACEA Communication team in Unit R1 and DGs DIGIT and COMM, through the web database where the forms are automatically stored. From this database, queries are automatically dispatched to the relevant functional mailboxes managed by the EACEA team responsible (usually the team managing the programme in question). If necessary, in order to reply to the enquiry, it may be shared with other colleagues in EACEA.</p> <p>For the generation of V-passes for visitors, personal data is also sent to the European Commission Security Service via the V-pass portal here: https://webgate.ec.europa.eu/v-pass/meetings</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

	<ul style="list-style-type: none"> - The European Ombudsman - The European Public Prosecutor's Office - EU courts and national authorities
13	<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>No</p>
14	<p>General description of the technical and organisational security measures</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>
15	<p>Information to data subjects / Privacy Statement</p> <p>Link to the privacy statement</p>