



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°

16-2022

In accordance with Article 31 of Regulation 2018/1725, individuals whose personal data are processed by the Education, Audiovisual and Culture Executive Agency ("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.*

| Insurance services for volunteers under Erasmus+, European Solidarity Corps and EU Aid Volunteers Initiative | |
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| 1 | Last update of this record (where applicable) Not applicable |
| 2 | Short description of the processing The Agency is responsible for the management of two insurance services contracts for Erasmus+ volunteers, European Solidarity Corps participants and EU Aid volunteers. The Agency receives and processes daily e-mails from the different stakeholders and it monitors the execution of the contracts via monthly and annual lists of enrolled volunteers and participants. The Erasmus+ and European Solidarity Corps monthly enrolment lists are shared with DG EAC for the organisation of the training offer. The EU Aid monthly enrolment lists are |

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| | <p>shared with DG EAC, with the Head of Unit and the Head of Sector in EACEA unit A5, as well as the Heads of EU Delegations for coordination purposes of the crisis management system.</p> <p>Personal data of the volunteers are processed in order to enable the participation in the actions and are sent to the contractor in charge of providing insurance coverage to participants and volunteers.</p> |
| Part 1 - Article 31 Record | |
| 3 | <p>Name of the Controller Unit(s) and/or function of person acting on behalf of the Controller</p> <p>Education, Audiovisual 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 Education, Audiovisual and Culture Executive Agency <p>Email address for the insurance contract for EU Aid volunteers: EACEA-EUAID-VOLUNTEERS@ec.europa.eu</p> <p>Email address for the insurance for European Solidarity Corps and E+ 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>Not applicable</p> |
| 6 | <p>Name and contact details of processor (where applicable)</p> <p>CIGNA International Health Services BV Plantin en Moretuslei 299 BE-2140 ANTWERPEN, Belgium Contact point: Privacy.europe@cigna.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 Erasmus+, European Solidarity Corps participants and EU Aid 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 Erasmus+ and European Solidarity Corps participants, the monthly lists of insured volunteers may be analysed by DG EAC and sent to the National Agencies for Erasmus+ and European Solidarity Corps in order to organise adequate training offer. 3. Regarding the insurance contract for EU Aid Volunteers, DG EAC sends information to Heads of EU Delegations in order to give them an updated information of the volunteers deployed in each third country in the framework of critical incident management. |
| 8 | <p>Description of the categories of data subjects</p> <p>Whose personal data are being processed?</p> |

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| | <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"/> 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 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>Erasmus+, European Solidarity Corps participants and EU Aid 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 checked="" type="checkbox"/> Other: please specify:</p> <p>Data originally collected during the enrolment process in the Erasmus+, European Solidarity Corps on the Youth Portal includes: Mandatory: first name, family name, data of birth, gender, email address, country of residence, country of nationality; Optional: address, phone number, education and employment, languages, CV.</p> <p>Data originally collected during the enrolment process in the EU Aid Volunteers initiative (EUAV) on the EU Aid Volunteers Platform includes:</p> |

- EU Aid volunteers: username, first name, family name, date of birth, gender, postal address, country of legal residence, nationality, email address, emergency contact, prior knowledge and experience, availability for projects, motivation to volunteer on a project, any additional information user wishes to provide, willingness to receive emails from EUAV.
- EU Aid online volunteers: username, first name, family name, gender, date of birth, nationality, telephone number(s).
- Authorised representatives of certified organisations: first name, family name, user name, email address, organisation(s) the person is entitled to administer.
- Platform users linked to a certified organisation or EUAV project: name, email address.
- Individual members of the public registered to the public forum: first name, family name, user name, email address, organisation(s) if applicable, country
- Project leaders: first name, family name, user name, email address, organisation(s) and project(s) for which the person is entitled to edit and create content.

The enrolment lists to the insurer's database contain the following personal data:

Personal Cigna reference number, Last name, First name, Gender, Date of birth, Start date and end date of the mobility/deployment, Nationality, E-mail address of the Volunteer/Participant, Last name and first name of the contact person in the Sending Organisation, e-mail address of the contact person in the Sending Organisation, Addressee (volunteer or contact person) for Youth card delivery, European Solidarity corps participant's reference number, Hosting organisation contact person, Post address of the hosting organisation, e-mail of the contact person in the hosting organisation and city and country of deployment.

The insurer collects and processes the following data, with the unique purpose of providing insurance coverage to the volunteers according to the contracts signed between the insurer and EACEA (contracts numbers 2014-3552 and 2015-1880):

Name, address, contact details, date of birth, gender, relationship to EACEA, national identification number, passport number or driving license number; information linked to the provision of the services (for example, to review and pay claims; to issue guarantee of payment/s when applicable); Information about job including job title or any other that may be strictly required to provide the services, provided that there is a connection between the access to the services and the job or job title; information relating to previous policies or claims; financial information such as bank or payment details; telephone recordings and other logs of your correspondence with the insurer; sensitive data including details of current and past physical and/or mental health.

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):

- revealing racial or ethnic origin
- revealing political opinions
- revealing religious or philosophical beliefs
- revealing trade-union membership
- concerning health

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| | <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> <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: N/A</p> |
| 10 | <p>Retention time (time limit for keeping the personal data)</p> <p>Indicate the period of storage: 10 years after the closure of the insurance contract for contractual matters (legal basis). Personal data is also kept by the contractor in accordance with Cigna's Records Retention Schedule for correspondence or claim related to legal regulatory obligations of CIGNA.</p> <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 Erasmus+ and European Solidarity Corps participants and for the insurance contract for EU Aid Volunteers. For the latter, in addition; the Heads of EU Delegations; • Designated staff of EACEA; • Authorised staff of the contractor of the Service Contracts N°2015-1880 (insurance contract for Erasmus+ and European Solidarity Corps participants) and N°2014-3552 (insurance contract for EU Aid Volunteers): Cigna International Health Services BV. <p>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>Not applicable</p> |

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| 13 | <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. 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 and DG EAC are located in Luxemburg.</p> <p>CIGNA: The server of the insurance provider is located at the data centre in Antwerp and is not cloud based. It will soon be moved to Amsterdam as the primary data centre and Uxbridge as the secondary data centre.</p> |
| 14 | <p>Information to data subjects / Data protection notice</p> <p>For Erasmus+ and European Solidarity Corps volunteers information about the data subject and the data protection notice is permanently available on the following website: https://europa.eu/youth/privacy_en</p> <p>For EU AID volunteers information about the data subject and data protection notice is permanently available on the following website: https://www.eacea.ec.europa.eu/about-eacea/data-protection_en#ecl-inpage-1044</p> |