



EUROPEAN EDUCATION AND CULTURE
EXECUTIVE AGENCY (EACEA)

The Provision of Services to Online Language Support

Data Protection Notice

The European Education and Culture Executive Agency ("EACEA") is committed to preserving your privacy. All personal data are dealt with in accordance with Regulation (EU) No 2018/1725 on the protection of personal data by the Union institutions, bodies, offices and agencies¹ ("the data protection regulation").

The following Data Protection Notice outlines the policies by which the EACEA collects, manages and uses the personal data of the concerned individuals within the Provision of Services to Online Language Support (OLS).

The Provision of services to Online Language Support (OLS) is an initiative of the European Commission, funded by the Erasmus+ and Erasmus Solidarity Programmes (2021-2027) and operated by a single organization for Lot 1 and by a consortium for Lot 2, under two service contracts with the European Education and Culture Executive Agency (EACEA). The Online Language Support is hosted on a corporate learning management platform of the European Commission called [EU Academy](#) that is operated by the Joint Research Centre (JRC) and DG DIGIT.

OLS aims to promote language learning and linguistic diversity to citizens in order to provide an improved experience of studying, learning, volunteering and/or working throughout the EU, strengthen multicultural exchanges through building communities of learners and raise linguistic interest in the EU as a whole through audiovisual content.

OLS provides a secured and safe online environment for mobility participants to follow language courses in all 29 official languages of the EU Member States and countries associated to the Erasmus+ and European Solidarity Corps (ESC) programmes. Mobility participants are also able to exchange best practices among themselves with the support, moderation and guidance of professional community managers. OLS consists of an open area freely accessible to any citizen and a core (restricted) area for Erasmus+ and European Solidarity Corps individuals in mobility.

Personal data is processed in order to give registered participants in the mobility management tools (Beneficiary Module - BM and Project Management Module - PMM) managed by Directorate-General for Education, Youth, Sport and Culture (DG EAC) and, those invited by mentors (role allocated by beneficiary institutions/organizations to language trainers/teachers) as well as community managers access to OLS courses. Personal data processing is necessary to allow individuals to engage in OLS mentoring groups and in learning community activities (e.g.: audiovisual conferencing and recording, text and image messages, videos/webcam recording, pictures and photos, content, screen-sharing).

¹ 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 Text with EEA relevance, OJ L 295, 21.11.2018, p. 39.

Personal data is also processed for communication (e.g.: campaign emails, surveys), and promotion (e.g.: newsletters) activities, as well as for research and statistical purposes. Furthermore, personal data is processed when replying to content and technical related users' queries.

1. Who is responsible for processing your personal data (data controller)?

The data controller is the European Education and Culture Executive Agency (EACEA), BE-1049 Brussels.

The person designated as being in charge of the processing operation is the Head of Unit A.6 Platforms, Studies and Analysis.

Email: EACEA-ONLINE-LANGUAGE-SUPPORT@ec.europa.eu

2. Which personal data are processed?

The following categories of personal data are processed in the framework of the Online Language Support:

i. Data concerning the physical characteristics of persons as well as the image or voice

Optional: Photos and videos made by participants talking about their mobility experience that they may choose to upload in the OLS learning communities. The aim of this exercise is to establish a catalogue of amateur video contributions in the open area of OLS and to participate in contests. Photos, pictures, images and videos may be shared in the learning communities, mentoring groups, during training sessions, peer-learning, or individual discussion in chats. Images may also be recorded during audiovisual conferences.

Mandatory: The teaching videos for language courses and videos featuring cultural and historical elements of programme countries' languages include images and voices of actors.

ii. Data concerning the data subject's private sphere

Optional: personal data that OLS users may disclose upon discussing (e.g. in chats, forums, learning communities, mentoring groups) and in helpdesk inquiries.

Mandatory: signatures of actors and personal data of actors and voice actors in the authorisation forms for use of photographs/videos, voice recording and for archiving purposes.

iii. Data concerning missions and journeys (mandatory)

For learners, country of destination and estimated start and end of the mobility period, type of mobility.

iv. Data concerning telephone numbers and communications (optional)

National Agencies and beneficiary institutions/organisations may share on a voluntary basis the telephone numbers of contact persons.

v. Data concerning names and addresses, including email addresses (mandatory)

First and last names and email address of OLS National Agency contact persons, beneficiary institutions/organisations contact persons, mobility participants, community managers and

teacher/trainers. For videos, first and family names, address, and country of actors, voice actors and script writers.

3. For which purpose do we process your data?

The data processing is necessary to:

- allow OLS learning community managers to moderate, facilitate interactions in the community, and support users.
- collect videos and learners' stories created by Erasmus+ and European Solidarity Corps mobility participants to establish a catalogue of amateur video contributions in the open area of OLS and publishing learners' stories inside OLS communities, so to promote language learning and linguistic diversity to citizens.
- send OLS users campaign emails (e.g., monthly newsletters, surveys, contests, promotion of learning communities, mentoring groups, content, new functionalities) for motivational purposes, provided that users have given their prior consent.
- extract aggregate data for research and statistical purposes.
- reply user queries and,
- produce and disseminate teaching videos for the language courses and videos featuring cultural and historical elements of programme countries' languages with the participation of actors and voice actors.

In addition:

- Other optional data submitted by mobility participants on OLS on a voluntary basis (e.g., messages in forums, online discussions and threads, files, photos, videos/webcam recordings and pictures) are processed to strengthen multicultural exchanges and promote language learning.
- Other information may be collected directly from the participants while handling helpdesk inquiries and providing content and technical support.

4. Where the data is collected from?

Personal data on EU Academy are collected in three ways:

- a. Personal data of Erasmus+ and European Solidarity Corps mobility participants are encoded in DG EAC's IT tools (BM and PMM) by beneficiary institutions/organisations. The personal data is transferred to EU Academy that grants mobility participants with access to the OLS core area in order for them to follow online language courses in the 29 official programme countries' languages.
- b. Personal data of Erasmus+ and European Solidarity Corps mobility participants who are not encoded in DG EAC's IT tools are directly invited via EU Academy by beneficiary institutions/organisations or teachers/trainers. Teacher/trainers may grant access to mentoring groups with the aim to support and guide learners in their online language learning journey. The access is limited in scope and time and defined by the teacher/trainer responsible for the group.
- c. Personal data of Erasmus+ and European Solidarity Corps mobility participants as well as citizens registered themselves with EU login in order to access the OLS open and core areas on EU Academy.

- d. Personal data submitted by Erasmus+ and European Solidarity Corps mobility participants on OLS on a voluntary basis (e.g., messages in forums, online discussions and threads, files, photos, videos/webcam recordings, pictures and participation in contests) are processed to strengthen multicultural exchanges and promote language learning.
- e. Personal data submitted by OLS participants while handling helpdesk inquires and providing content and technical support.
- f. Personal data submitted by OLS participants while registering to receive the OLS newsletter.

5. Who has access to your personal data and to whom is it disclosed?

Access to personal data and other information such as language(s), course level, results of language assessments (available in the OLS EU Academy dashboard that is tailored to each specific stakeholder) may be given on a need-to know basis to the following recipients:

- **Authorised staff of the European Commission, in particular:**
 - **Directorate-General for Education, Youth, Sport and Culture (DG EAC)** of the European Commission: personal data of Erasmus+ and European Solidarity Corps individuals in mobility data encoded in DG EAC's IT tools (BM and PMM), Erasmus+ and European Solidarity Corps National Agencies (NAs) and beneficiary institutions/organizations (BENs) contact persons, and data for research and statistical purposes.
 - **Directorate-General for Communication (DG COMM)** of the European Commission: photographs, films and/or sound recording bearing actors' voice for teaching, learning and promotion as well as for archiving purposes in the European Union's online databases accessible to the public online for free of charge.
 - **Joint Research Centre (JRC) and DG DIGIT** (personal data of Erasmus+ and European Solidarity Corps (ESC) individuals in mobility and personal data of OLS users).
 - **DG CNECT** (e.g., for the management and publication of newsletters): limited data of users (e.g.: first and last name and contact email address).
- **Authorised staff of EACEA:** limited data of participants (e.g.: first and last name, contact email address, course level, results of language assessment, and language), Erasmus+ and European Solidarity Corps NAs and BENs (i.e., first and last name of contact persons, contact persons e-mail address) and data for communication, support, research and statistical purposes.
- **Authorised staff of the processors** and their providers (sub-processors) who act on behalf and under the instructions of EACEA: e.g., first and last names, contact e-mails address and data of NAs, BENs, teachers/trainers and mobility participants for language learning, communication, support and statistical purposes (e.g.: language, course level, language assessment results) or as necessary to fulfil their assignment(s).

Authorised staff of the following contractors, which act as processors:

Lot 1 - Core and open learning contents

- Centre de Langues à Louvain la Neuve et en Woluwe (CLL) ASBL

Lot 2 - Community Management, Open Video Production, Communication/Promotion

- European Service Network SA
- Berlitz Language and Business Training SARL
- Tremend Benelux S.A.

Authorised staff of the following subcontractors, which act as sub-processors:

Lot 2 - Community Management, Open Video Production, Communication/Promotion

- Lai-momo Società Cooperativa Sociale

- **Authorised staff of Erasmus+ and European Solidarity Corps National Agencies** (including in the participating third countries): limited data of beneficiary institutions/organisations (e.g.: first and last names of project-contact person, project contact person telephone number, and contact person e-mail address) and of individual mobility participants (e.g.: first and last names, email address, nationality, mobility identifier, type of mobility, country of destination, and start and end date of mobility period).
- **Authorised staff of beneficiary institutions/organisations** (including in the participating third countries): data related to individual mobility participants (e.g.: first and last name, contact email address, mobility identifier, nationality, type of mobility, country of destination, start and end date of mobility period, course level, results of language assessments, language of mobility).
- **OLS teachers/trainers** supporting learners in their language learning activities: aggregate and individual data pertaining to the learners under an identified project assigned to the teacher/trainer.
- **General Public:** publication of personal data can be made on the Internet, on EC and EACEA websites, EC corporate platforms and/or EC social media accounts (including VIMEO platform – see [Privacy Policy on Vimeo](#)).

For Erasmus+ volunteers/European Solidarity Corps participants, the results will not be communicated to the other organisation(s) in the project.

As a registered OLS user, optional data submitted by users, e.g., messages in forums, online discussions and threads, files, videos/webcam recording and pictures posted onto the mentoring groups or learning communities may be visible to other OLS registered users.

In addition, data may be disclosed to public authorities, and processed by these authorities in compliance with the applicable data protection rules according to the purpose of the processing, including inter alia:

- 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 competent Appointing Authority in case of a request or a complaint lodged under Articles 90 of the Staff Regulations
- OLAF in case of an investigation conducted in application of Regulation (EC) No 1073/1999
- The Internal Audit Service of the Commission within the scope of the tasks entrusted by Article 118 of the Financial Regulation and by Article 49 of the Regulation (EC) No 1653/2004
- IDOC in line with Commission Decision C(2019)4231 of 12 June 2019 laying down general implementing provisions on the conduct of administrative inquiries and disciplinary proceedings and Commission Decision (EU) 2019/165 of 1 February 2019 laying down

internal rules concerning the provision of information to data subjects and the restriction of certain of their data protection rights in the context of administrative inquiries, pre-disciplinary, disciplinary and suspension proceedings

- The Court of Auditors within the tasks entrusted to it by Article 287 of the Treaty on the Functioning of the European Union and Article 20, paragraph 5 of Regulation (EC) No 58/2003
- The European Ombudsman within the scope of the tasks entrusted to it by Article 228 of the Treaty on the Functioning of the European Union
- The European Public Prosecutor's Office within the scope of Article 4 of Council Regulation (EU) 2017/1939 of 12 October 2017 implementing enhanced cooperation on the establishment of the European Public Prosecutor's Office.

Whenever possible, data will be processed in an anonymous way, especially if transferred to third parties for research purposes.

Personal data will never be used for marketing purposes.

Please note that, in order to deliver its service, Vimeo will act as separate controllers for the processing of personal data on which they determine the means and the purposes, and might transfer your personal data outside the EU in accordance with their privacy policies ([Vimeo privacy statement: Privacy Policy on Vimeo](#)).

6. How long do we keep your personal data?

Data encoded in DG EAC's IT tools (BM and PMM) and shared with EACEA:

Mobility participants personal data such as:

- last and first names, contact e-mail address, mobility identifier, nationality, type of mobility, country of destination, start and end date of the mobility period,
- other data submitted on a voluntary basis by mobility participants (e.g., messages in forums, online discussions and threads, files, videos/webcam recordings and pictures).

National Agencies and Erasmus+/European Solidarity Corps beneficiary institutions/organisations: first and last names of contact person, contact person telephone number, contact person e-mail address.

The retention period of these data is established in the DG EAC's record and privacy statement <https://webgate.ec.europa.eu/erasmus-esc/index/privacy-statement>

“Management of mobilities: DG EAC processes your personal data for the duration of your grant project, which can be up to 36 months maximum. After that, DG EAC must retain your personal data as long as it is required by EU law for audit purposes, because checks or fraud investigations are routinely carried out after completion of actions, and the data must be available so that issues such as fake participation and double funding can be ruled out. Ultimately, we will delete data maximum 10 years after the end of the year of closure of the agreement between the National Agency and the Commission from which the project in which you participated was funded”.

“Organisation registration: personal data linked to organisations participating in projects will be deleted 10 years after the end of the year of the closure of the last project in the relevant programme (defined by the last financial transaction between NA and the beneficiary organisation) unless the organisation is participating in another programme. In addition, every 3 years, data of organisations that have neither applied for funding nor participated in a project in that period will be deleted”.

The retention period for community managers and teachers/trainers personal data that may be shared with EACEA (e.g., first and last name and contact email) is of 5 years.

Data related to statistics and research purposes is kept for the entire duration of the OLS initiative. At the end of the contract, the processors will hand over all information and data to EACEA and will not keep a copy of confidential information, documents and personal data in any format. The data remain solely for research and monitoring purposes, at the disposal of EACEA, the European Commission, national agencies and beneficiary institutions/organisations, CLL and ESN on behalf of the consortium and other third parties under the authorisation of the Data Controller in an aggregated, anonymous format.

The retention period of personal data of actors, voice actors and scriptwriters participating in teaching videos for the language courses and videos featuring cultural and historical elements of programme countries' languages (last name, first name, signature, address, country, visual and voice recording) is 15 years from the day of the signature of the release form.

The voice recording may be hosted and / or published on public platforms on the Internet (e.g. VIMEO) and on European Commission (EC) websites, EC corporate platforms and/or EC social media accounts for up to 15 years. Data may be used and archived by the EC in accordance with the applicable data protection record <https://ec.europa.eu/dpo-register/detail/DPR-EC-00074.1>.

Photos and videos made by participants talking about their mobility experience that they may choose to upload in the OLS learning communities and photos, pictures, images, images recorded during audiovisual conferences and videos may be shared in the learning communities, mentoring groups, during training sessions, peer-learning, or individual discussions in chats. The retention period of these data is established in the EU Academy record and privacy statement. *“Educational or instructive videos and capture of image and/or voice: will be deleted 3 years after the last interaction of the user on the platform”*.

<https://academy.europa.eu/admin/tool/policy/view.php?versionid=19&returnurl=https%3A%2F%2Facademy.europa.eu%2F>

Videos, images and photographs of OLS users published on the EC and EACEA websites, EC corporate platforms and/or EC social media accounts upon consent will be removed of 15 years after their publication.

The retention period of OLS user's personal data shared with EACEA for campaign emails (e.g., monthly newsletters, surveys, contests, promotion of learning communities, mentoring groups, content, new functionalities) for motivational purposes upon consent is of 5 years after the last log in of the user to EU Academy.

The retention period of user's personal data shared with DG CNECT (in Newsroom) to register to OLS newsletters is of 5 years after the last interaction (i.e., subscribing, confirming subscription, update users' profile) of the data subject with Newsroom. Users could erase his/her account or unsubscribe from the mailing list at any time and his/her profile and personal data will be completely erased. This is described in the data protection record No [DPR-EC-03928.1](#) and in the Newsroom [Data Protection Declaration Wiki page](#).

7. What are your rights concerning your personal data and how can you exercise them?

Under the provisions of the data protection regulation, you have the right to:

- Request to access the personal data EACEA holds about you
- Request a rectification of your personal data where necessary

- Request the erasure of your personal data
- Request the restriction of the processing of your personal data
- Request to receive or to have your data transferred to another organisation in commonly used machine-readable standard format (data portability).

As the processing of part of your personal data is based on Article 5(1)(a) of the data protection regulation, please note that you have the right to object to processing of your personal data on grounds relating to your particular situation under the provisions of Article 23 of the data protection regulation.

In addition, as the processing of part of your personal data is based on your consent as per Article 5(1)(d) of the data protection regulation, please note that you can withdraw it at any time, and this will have effect from the moment of your retraction. The processing based on your consent before its withdrawal will remain lawful.

Please also note that Article 25 of Regulation (EU) 2018/1725 provides that, in matters relating to the operation of EU institutions and bodies, the latter can restrict certain rights of individuals in exceptional circumstances and with the safeguards laid down in that Regulation. Such restrictions are provided for in internal rules adopted by EACEA and published in the Official Journal of the European Union:

<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32021Q0317%2801%29>

Any such restriction will be limited in time, proportionate and respect the essence of the above-mentioned rights. It will be lifted as soon as the circumstances justifying the restriction are no longer applicable. You will receive a more specific data protection notice when this period has passed.

As a general rule, you will be informed on the principal reasons for a restriction unless this information would cancel the effect of the restriction as such.

You have the right to make a complaint to the EDPS concerning the scope of the restriction.

8. Your right to have recourse in case of conflict on any personal data issue

In case of conflict on any personal data protection issue you can address yourself to the Controller at the above-mentioned address and functional mailbox.

You can also contact the Data Protection Officer of EACEA at the following email address: eacea-data-protection@ec.europa.eu.

You may lodge a complaint with the European Data Protection Supervisor at any time: <http://www.edps.europa.eu>.

9. On which legal basis are we processing your personal data?

The processing of your personal data is based on the following paragraphs of Article 5(1) of the data protection regulation:

(a) processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Union institution or body (to be laid down in Union Law):

- Regulation (EU) 2021/817 of the European Parliament and of the Council of 20 May 2021 establishing Erasmus+: the Union Programme for education and training, youth and sport and repealing Regulation (EU) No 1288/2013 (OJ L 189, 28.5.2021, p. 1–33)

- Regulation (EU) 2021/888 of the European Parliament and of the Council of 20 May 2021 establishing the European Solidarity Corps Programme and repealing Regulations (EU) 2018/1475 and (EU) No 375/2014 (OJ L 202, 8.6.2021, p. 32–54)
- Commission Implementing Decision (EU) 2021/173 of 12 February 2021 establishing the European Education and Culture Executive Agency
- Commission Decision C(2021)951 and its annexes delegating powers to EACEA for the management of programmes in the MFF 2021-2027

(d) the data subject has given consent to the processing of his or her personal data for one or more specific purposes:

- Receive campaign mails (e.g., monthly newsletters, surveys, contests, promotion of learning communities, mentoring groups, content, new functionalities) for motivational purposes.
- Use of the images and sound recording for all types of publications, in any form of televisual broadcasting or communication via the Internet, on public platforms (e.g. VIMEO) and on EACEA and European Commission (EC) websites, corporate platforms and/or social media accounts and archive the sound recording in the European Union's online databases.