



## RECORD OF PERSONAL DATA PROCESSING

Record n°

N° 2023-09

In accordance with Article 31 of Regulation 2018/1725, 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 (hereafter the Regulation), the Agency has to keep records of its processing operations.

This record covers two aspects:

1. Mandatory information on the processing (part 1 - publicly available)
2. Compliance check and risk screening (part 2 - internal only to the Agency, not published)

The ground for the record is:

- 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 under the old regulation to record.

<b>Processing personal data in the frame of the Study in Europe initiative</b>	
1	<b>Last update of this record (where applicable)</b>  This is an update of the record due to the selection of a new contractor
2	<b>Short description of the processing</b> EACEA is processing personal data for the implementation of the "Study in Europe" initiative via a processor, which is the contractor mentioned here above. For the contract Study in Europe, the contractor is processing and collecting personal data through the inscription of fairs, webinars, training and networking events, online meetings but also through the publishing of testimonials on social media and an online portal. The aim of the contract is promoting study opportunities in Europe, through various means and channels, on a global level.
<b>Part 1 – General Information</b>	
3	<b>Name of the Controller Unit(s) and/or function of person acting on behalf of the Controller</b>  Controller: European Education, and Culture Executive Agency (EACEA) Unit(s): <i>Head of Unit A3,</i>

	<a href="mailto:EACEA-A3@ec.europa.eu">EACEA-A3@ec.europa.eu</a>
4	<b>Contact details of the Data Protection Officer (DPO)</b> <a href="mailto:EACEA-data-protection@ec.europa.eu">EACEA-data-protection@ec.europa.eu</a>
5	<b>Name and contact details of joint controller (where applicable)</b> N/A.
6	<b>Name and contact details of processor (where applicable)</b> <i>Contractor :</i> <ul style="list-style-type: none"> <li>• <i>Campus France 28 rue de la Grange aux Belles 75010 Paris France</i></li> </ul> <i>Consortium members:</i> <ul style="list-style-type: none"> <li>• <i>Deutsche(r Akademischer Austauschdienst (DAAD) Kennedyallee 50 53175 Bonn GERMANY</i></li> <li>• <i>Stichting Nuffic (Nuffic) Kortenaerkade 11 2518 AX Den Haag NETHERLANDS</i></li> <li>• <i>Academic Cooperation Association (ACA) Rue d'Egmont 15 1000 Bruxelles BELGIUM</i></li> <li>• <i>Haridus- ja Noorteamet (Education and Youth Board) (Harno) Lõõtsa tn 4 Tallinn 11415, Estonia</i></li> <li>• <i>Dům zahraniční spolupráce (DZS): Na Poříčí 1035/4, Prague Česko 110 00, Czechia</i></li> </ul>
7	<b>Purpose of the processing</b> <p><i>The “Study in Europe” initiative, with the support of the contractor, is to provide a range of services and advice which together contribute to enhancing the attractiveness of European higher education globally and raising the worldwide visibility and attractiveness of Europe as a study destination. The processing of data, within the above explained context, is done for:</i></p> <p>-Registration:</p> <ul style="list-style-type: none"> <li>-of exhibitors and students at fairs relating to studies in Europe</li> <li>-of participants to the webinars on the improvement of promotional activities <ul style="list-style-type: none"> <li>• for the virtual fairs ;</li> <li>• for the institutional events promoting studies: this includes taking pictures (photo shoots, etc ) of these for organisational / promotional purposes (promotion materials, illustration for articles, etc )</li> </ul> </li> </ul> <p>-Evaluation of the fairs by the participants</p> <p>-Use of networking platforms and virtual communication tools</p> <p>-The creation of Exhibitor catalogues for the fairs</p> <p>-Fair logistics;</p> <ul style="list-style-type: none"> <li>- The communication with the National Agencies (NAs), including NAs meetings</li> <li>- And promotion/dissemination of h publication of testimonials, social media posts etc</li> </ul>
8	<b>Description of the categories of data subjects</b> Whose personal data are being processed? <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> -Contractors</li> <li><input checked="" type="checkbox"/> -Complainants, correspondents</li> <li><input checked="" type="checkbox"/> -External experts</li> <li><input checked="" type="checkbox"/> Other, please specify:</li> </ul>

	<i>Event participants to fair and online, students; exhibitors; Higher Education Institutions (HEI) Representatives; National Promotion Agencies representatives and staff of EU Delegations</i>
9	<p><b>Description of personal data categories</b></p> <p><b>a) Categories of personal data:</b></p> <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> personal identification numbers (IDs, passport, etc)</li> <li><input checked="" type="checkbox"/> contact details (names and addresses (including email addresses),</li> <li><input checked="" type="checkbox"/> registration data and data for /participation to meeting, etc</li> <li><input checked="" type="checkbox"/> physical characteristics of persons: image, voice, video recording, etc</li> <li><input checked="" type="checkbox"/> financial data such as bank accounts, etc.-</li> <li><input checked="" type="checkbox"/> info concerning the data subject's career missions and journeys</li> <li><input checked="" type="checkbox"/> Data subjects' communications via phone, emails, etc</li> <li><input checked="" type="checkbox"/> geo/localisation, IP address, etc</li> </ul> <p><b>b) Categories of personal data processing likely to present <u>specific risks</u>:</b></p> <p><input type="checkbox"/> None</p> <p><b>c) Categories of personal data whose processing is <u>prohibited</u>, with exceptions (art. 10):</b></p> <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> concerning health: data such as for instance: diet requirements for physical events/fairs implying lunches or dinners and access requirement for disabled people if requested specifically by the data subject concerned may be processed</li> </ul> <p><input type="checkbox"/> <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>EACEA follows the EC retention list. Contractual data may be kept up to 10 years after the last payment.</p> <p>Data are kept:</p> <p>For maximum 5 years after the end of the project (and where applicable incl. data on invoicing) for:</p> <ul style="list-style-type: none"> <li>• Surveys for the analyses</li> <li>• Fair registration and data on exhibitors</li> <li>• (F2F) fair registration students</li> <li>• Registration for institutional events</li> <li>• Other participants in the fairs /events</li> <li>• Speakers in the events</li> <li>• Registration International Conferences</li> <li>• Registration events (contact-building, EU policy,)</li> <li>• Evaluation of events</li> <li>• Networking platforms, virtual communication tools</li> <li>• Testimonials</li> <li>• Annual NAT meetings</li> <li>• HEI Trainings</li> <li>• Communication to NAT</li> </ul> <p>For 6 months after the event for:</p>

	<ul style="list-style-type: none"> <li>• Virtual fair registration</li> </ul> <p>Until the end of the project for:</p> <ul style="list-style-type: none"> <li>• Fair logistics</li> <li>• Data on Teams</li> </ul> <p>Webinar registration (on partner's internal storage (Dropbox)) and data on Zoom is automatically deleted after 12 months.</p> <p><b>Is any further processing for historical, statistical or scientific purposes envisaged?</b>  <input type="checkbox"/> yes <input checked="" type="checkbox"/> no</p> <p><b>If yes, the further retention time is: N/A</b></p>
11	<p><b>Recipients of the data</b></p> <p>Access to personal data is provided to the EACEA staff responsible for carrying out this processing operation and to any authorised staff according to the “need to know” principle. Such staff abide by statutory confidentiality obligations.</p> <p>The following recipients may also access to personal data:</p> <ul style="list-style-type: none"> <li>• Authorised staff of the European Commission, in particular the Directorate-General for Education, Youth, Sport and Culture (DG EAC), Directorate-General for Digital Services (DG DIGIT) acting as processor for EACEA and       <ul style="list-style-type: none"> <li>○ its contractor (MICROSOFT) for the use of TEAMS (see <a href="#">Privacy Statement for M365</a>, );</li> <li>○ and its contractor (CISCO) for the use of WEBEX/ web conference service (see <a href="#">Privacy Statement for WEBEX</a> );</li> </ul> </li> <li>• Authorised staff of EU Delegations and other EU Institutions when relevant</li> <li>• Authorised staff of the EACEA contractor(s) acting as processor(s):</li> </ul> <p><i>Contractor :</i></p> <p><i>Campus France 28 rue de la Grange aux Belles 75010 Paris FRANCE</i></p> <p><a href="https://www.campusfrance.org/en/privacy-policy">https://www.campusfrance.org/en/privacy-policy</a></p> <p><i>Consortium members:</i></p> <p><i>-Deutscher Akademischer Austauschdienst (DAAD) Kennedyallee 50 53175 Bonn GERMANY;</i></p> <p><i>-Stichting Nuffic (Nuffic) Kortenaerkade 2518 AX Den Haag NETHERLANDS;</i></p> <p><i>-Academic Cooperation Association (ACA) Rue d'Egmont 15 ,1000 Bruxelles BELGIUM ;</i></p> <p><i>-Haridus- ja Noorteamet (Education and Youth Board) (Harno) Lõõtsa tn 4 Tallinn 11415, ESTONIA;</i></p> <p><i>-Dům zahraniční spolupráce (DZS): Na Poříčí 1035/4, Prague Česko 110 00, CZECH REPUBLIC;</i></p> <p>The contractor(s) abide by contractual confidentiality requirements. Only the</p>

data mentioned in this data protection record and in line with the conditions stipulated herewith are processed by the contactor(s)

- Public access for the data published on [Study in Europe - European Education Area](#) website and/or on the social media of DG EAC (X, Facebook, etc )

<b>Activities</b>	<b>Tool for data processing</b>	<b>Receiving partners</b>
<b>Surveys for the analyses</b>	EU survey	CF, ACA & Harno,
<b>Fair registration Exhibitors</b>	<a href="https://studyineuropefairs.eu/">https://studyineuropefairs.eu/;</a>	CF, DAAD, Harno, and sub-processors; Nuffic, DZS & gotoAndPlay OÜ (manage- fair registration and the overall platform and website functions)
<b>(F2F) Fair registration students</b>	<a href="https://studyineuropefairs.eu">https://studyineuropefairs.eu</a>	CF, DAAD, Harno, and sub-processors: Nuffic, DZS & gotoAndPlay OÜ (manage fair registration and the overall platform and website functions)
<b>Virtual fair registration</b>	meetyoo EnPersonnevirtual (inkwink)	DAAD, Campus France, Nuffic, DZS &, meetyoo, EnPersonnevirtual
<b>Registration institutional events</b>	<a href="https://studyineuropefairs.eu/">https://studyineuropefairs.eu/</a> , EU survey tool	CF, DAAD, Harno, Nuffic, DZS & gotoAndPlay OÜ (manage fair registration and the overall platform and website functions)
<b>Other participants in the fairs /events</b>	<a href="https://studyineuropefairs.eu/">https://studyineuropefairs.eu/</a> , EU survey tool	CF, DAAD, DZS Nuffic &, service provider, Harno

<b>Speaker in the events</b>	https://studyineuropefairs.eu/, EU survey tool	CF, DAAD, DZS Nuffic &, service provider, Harno
<b>Exhibitor Catalogue</b>	<a href="https://database.exhibitorcatalogue.com/">https://database.exhibitorcatalogue.com/;</a>	DAAD
<b>Fair logistics</b>	Email, Excel	DAAD
<b>Registration International Conferences</b>	https://studyineuropefairs.eu/, EU survey tool	CF, DAAD, DZS & Harno
<b>Registration Events (contact-building, EU policy,)</b>	EU survey	CF, ACA, Harno, DZS &, Nuffic
<b>Photos of events</b>	No tool	Partners in charge of organising events (CF, Nuffic, DAAD, DZS &, Harno)
<b>Evaluation of events</b>	EU survey	CF, ACA, Harno & DZS, Nuffic
<b>Testimonials</b>	EU survey	Nuffic & Harno
<b>Social media</b>	Facebook, Instagram, and YouTube	Harno
<b>Gamification campaign solutions</b>	https://studyineurope.adact.me/europequiz	Harno, Adact & OÜ
<b>Annual NAT meeting</b>	EU survey	CF, ACA or Harno
<b>Webinar registration</b>	Zoom, Excel	ACA
<b>HEI Training</b>	EU survey	CF, ACA or Harno
<b>Event platform</b>	BigBlueButton (EC tool)	ACA
<b>Collaborative platform</b>	Open Social	ACA, Harno
<b>Communication to NAT</b>	Email, Excel	CF

For online fairs and institutional events, Consortium members have used the following third -party tools: Zoom (professional accounts), [Meetyoo](#) and [EnPersonneVirtual](#). Meetyoo is based in Germany. Hereunder the link to their privacy

policy <https://www.meetyoo.com/en/privacy-policy-meetyoo-pro-show-organizer>

- Use of third party tools and EU based tools such as Limesurvey (<https://www.limesurvey.org/privacy-notice>) and , enPersonne (<https://www.enpersonnevirtual.com/>)

The collected information will not be given to any third party, except to the extent and for the purpose that it we may be required to do so by law.

Data may be disclosed to public authorities in accordance with Union and Member State law such as the European Court of Justice, the relevant national judge as well as the lawyers and the agents of the parties in case of legal proceedings, the Investigation and Disciplinary Office of the European Commission (IDOC), the competent Appointing Authority in case of a request or a complaint lodged under Articles 90 of the Staff Regulations, the European Anti-Fraud Office (OLAF), the Internal Audit Service of the Commission (IAS), the Court of Auditors, the European Ombudsman, the European Data Protection Supervisor (EDPS) and the European Public Prosecutor's Office (EPPO).

12 **Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards?**

Activities	Third parties / external service providers OUTSIDE Europe (data sharing)
<b>Fair registration Exhibitors</b>	Kenya: University Fairs Albania Other fair countries are not yet confirmed (to be confirmed via the privacy statement)
<b>F2F Events</b>	For F2F events outside of Europe, names may be shared with service providers in charge of printing badges/programmes etc.
<b>Registration International Conferences</b>	NAFSA (National Association of Foreign Student Advisers), USA APAIE (Asia-Pacific Association for International Education) FAUBAI (Brazilian Association for International Education), Brazil
<b>Registration Events (contact-building, EU policy,)</b>	potential partner / service provider in the countries: Albania

For the place of the events/fairs, transfer of data outside the EU concern several countries of which Albania, Kenya, Colombia and India are known as well as Brazil & USA for international conferences others will be established during the lifetime of the contract and be detailed in the Data Protection Notice .

Only the name and the name of institution of the participating exhibitors will be shared with the service providers, for example, for the printing of name badges.

For transfer of data to third countries outside the EU without adequacy decision, they are based on derogation as set out in Article 50 of the Data Protection Regulation:

- explicit consent of the data subjects;
- data is necessary for the performance of a contract concluded between the controller and the processor in the interest of the data subjects to benefit from advice on European higher education
- The transfer is also necessary for important reasons of public interest as recognised in the Union law (Article 11 of the Treaty of the European Union, Article 15 of the Treaty on the Functioning of the EU , Article 14 of the Charter of Fundamental Rights of the European

	<p>Union and Article 26 of the Universal Declaration of Human Rights).The Erasmus Programme encourages the participation of young people in Europe’s democratic life, by supporting activities that contribute to citizenship education and participation projects for young people to engage and learn to participate in civic society, thereby raising awareness of European common values ( see Recital n° 28 of the Erasmus Regulation (Regulation (EU) 2021/817)).</p> <p>The EC Adequacy Decision with the US will apply for the use of IT tools such as Zoom, M365/TEAMS and WEBEX, where it may imply the possible transfer of data to the U.S. The use of WEBEX may also imply the possible transfer of data to the U.K and is covered by the EC Adequacy Decision with the UK.</p>
13	<p><b>General description of the technical and organisational security measures</b></p> <p>The IT systems used by the Agency are the ones of the Commission and abide by the Commission's security guidelines. The Agency is bound by the Commission Decision (EU, Euratom) 2017/46 of 10 January 2017 on the security of communication and information systems in the European Commission.</p> <p><b>1. Organisational measures:</b></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 or e-/folders of the Commission and all Agency staff are bound by a confidentiality obligation. The need-to-know principle applies in all cases.</p> <p><b>2. Technical measures:</b></p> <ul style="list-style-type: none"> <li>- Partners of the Consortium have internal procedures/policies/corporate rules concerning data collection, storage and transfer that are applied to activities and secure IT systems;</li> <li>- Before each activity, data protection issues as well as clauses and consent forms are checked with the respective DPOs of EACEA and of the Contractor;</li> <li>- Only essential data are collected, ;</li> <li>- Name lists are not disseminated during events and are only communicated to people who need them to make badges and distribute the badges to participants.;</li> <li>- The personal data shared with service providers is limited to the strict necessary in order to be able to implement the activities successfully;</li> <li>- Careful selection of service providers (following procurement procedures), some service providers are recommended by EU Delegations;</li> <li>- Exhibitor registration platform (<a href="https://studyineuropefairs.eu/">https://studyineuropefairs.eu/</a>): <ul style="list-style-type: none"> <li>o Collection of data by staff members of CF, DAAD, Harno &amp; Nuffic. The service provider based in Estonia that manages the overall platform functions is able to access the data;</li> <li>o Password restricted access is ensured.</li> </ul> </li> <li>- Fair exhibitors and visitors and event participants: <ul style="list-style-type: none"> <li>o Clear information about data collection and the use of data is included in the registration forms (terms of service, consent forms) are checked with the respective DPOs of EACEA and of the Contractors; Standard data protection</li> </ul> </li> </ul>

clauses include:

Explanation on the identity of the data controller, the use of the data (purpose and legal basis), information regarding the sharing of data with relevant third parties for the implementation of the event, the fact that the partners do not sell, trade or rent personal information to third parties, the data retention period, contact of the DPO and all the data subjects' rights, procedure in the event of a complaint;

- When filling in the registration forms, exhibitors/visitors/participants are explicitly asked to give their consent that their data is used for the purpose of their event participation and the event organisation, including the data transfer outside European Union when applicable
- A specific consent form for photos and video recordings is used
- Data is stored on secured platform (<https://studyineuropefairs.eu/>), and storage / IT systems and conserved for the duration indicated in the terms of use, after which data are deleted.

### **Campus France**

Campus France took part in the "Cyber-Security pathway" managed by ANSSI. The programme's recommendations are being pursued through a security plan up to 2025.

A number of actions have been taken to limit cyber risks:

- A CISO (Chief Information Security Officer) has been appointed to define IS security governance
- Administrative access has been streamlined and made more robust
- An external SOC (Security Operation Center) has been set up (24/7 security incident detection and supervision service)
- Several sensibilisation programs have been completed by Campus France employees

At the same time, Campus France regularly tests its systems using various tools to monitor cybersecurity indicators.

Campus France has set up a Security Assurance plan ("Plan d'assurance sécurité") and a Security policy for information systems ("Politique de sécurité des systèmes d'information (PSSI)"). The latter can be shared if needed.

In order to ensure the security of its information system and the data it processes (whether or not it owns the data), Campus France takes various requirements into account. These requirements are set out in the Campus France PSSI and are derived, for the most part, from the following guidelines:

- Guide d'hygiène informatique de l'ANSSI (Agence nationale de sécurité des systèmes d'information) ;
- The ISO 27002\_2022 standard on "Information security, cybersecurity and privacy - Information security measures".

The use of robust encryption algorithms (e.g. AES) makes it possible to secure stored data or data in motion in order to reduce the risks of loss of confidentiality (file transfer, messaging, encryption of laptop hard drives, etc.).

Robust encryption methods can also be used to securely authenticate exchanges (electronic signature) and ensure their integrity (in particular through hash functions). Systems such as RESANA and ZED ensure secure / encrypted transfer of data.

Security incident management: Campus France has an incident management policy that enables it to quickly and effectively manage security events/incidents that may impact the IT system.

A technical and continuous monitoring system enables anomalies to be dealt with quickly. An escalation and qualification process filters events to prioritize the resolution of the most significant incidents.

The CISO (Chief Information Security Officer) regularly monitors the state of the threat.

Campus France constantly monitors compliance with internal requirements (PSSI) and legal requirements through audits. An action plan enables the CISO to monitor the implementation

	<p>of identified security requirements over time.</p> <p>With regard to regulations on the protection of personal data, the Data Protection Officer of Campus France ensures that the principles set out in the GDPR are properly applied. Formal procedures ensure that the rights and information of the people whose data is processed are managed.</p> <p>With regard to the confidentiality of data in the context of contracts or partnership relations with third parties, Campus France undertakes to comply with the following obligations:</p> <ul style="list-style-type: none"> <li>- Not to use the documents and information processed for purposes other than those provided for in the contract;</li> <li>- To take all appropriate security measures to ensure the conservation and integrity of the documents and information processed for the duration of the contract;</li> <li>- To hand over the data and destroy it at the end of the contract.</li> </ul> <p><u>Campus France has a procedure in case of data breach:</u></p> <ul style="list-style-type: none"> <li>- Informing the DPO if a breach occurs (employees are sensibilized to this subject);</li> <li>- Analysis of the extent and impact of the breach in collaboration with the DPO;</li> <li>- Where necessary, informing the data controller (when Campus France is qualified as data processor) within the time limit stipulated in the contract;</li> <li>- Drafting of an "Accountability" sheet, with the DPO, to document the data breach and to determine whether it is necessary to notify the CNIL and inform the data subjects, in accordance with Articles 33 and 34 of the GDPR;</li> <li>- Where appropriate, notification of the CNIL;</li> <li>- Where appropriate, informing the data subjects;</li> <li>- Completion of the register of data breaches.</li> </ul> <p>To keep up-to-date with current legislation and in order to have full documentation on all of the activities it implements, Campus France is updating the organisation's policy document on the duration of conservation of personal data.</p> <p>Campus France's Data Protection principles can be provided upon request.</p> <p><b>Nuffic</b>  <a href="#">Privacy statement Stichting Nuffic   Nuffic</a>  <b>Nuffic has set up relevant security and data breach measures, see</b>  <a href="#">Nuffic's integrity policy   Nuffic</a></p>
14	<p><b>Information to data subjects / Data Protection Notice (DPN)</b>  <i>The information on the processing is made available to the data subjects through a DPN.</i></p>