



## 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°

09/2023

*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
- ☐ Migration from notification to record.

Processing personal data in the frame of the Study in Europe contract	
1	<b>Last update of this record (where applicable)</b> N/A
2	<b>Short description of the processing</b> EACEA is processing personal data for the implementation of the "Study in Europe" project 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, 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 - Article 31 Record</b>	
3	<b>Name of the Controller</b> <b>Unit(s) and/or function of person acting on behalf of the Controller</b> European Education, and Culture Executive Agency Head of Unit A3, <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> Contractor : <ul style="list-style-type: none"> <li>• Campus France 28 rue de la Grange aux Belles 75010 Paris France vAT FR 547 521954 38</li> </ul> Consortium members: <ul style="list-style-type: none"> <li>• Deutscher Akademischer Austauschdienst Kennedyallee 50 53175 Bonn GERMANY</li> <li>• Stichting Nuffic Kortenaerkade 11 2518 AX Den Haag NETHERLANDS</li> <li>• Academic Cooperation Association Rue d'Egmont 15 1000 Bruxelles BELGIUM</li> <li>• Sihtasutus Archimedes L. Koidula 13a 10125 Tallinn ESTONIA</li> </ul>
7	<b>Purpose of the processing</b> <p>The project 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:</p> <ul style="list-style-type: none"> <li>• Registration of Exhibitors at fairs relating to studies in Europe</li> <li>• Registration of students at the fairs</li> <li>• Registrations for the Virtual fairs</li> <li>• Registrations for the Institutional events promoting studies</li> <li>• Taking pictures of these for organisational / promotional purposes</li> <li>• Evaluation of the fairs by the participants</li> <li>• Use of networking platforms and virtual communication tools</li> <li>• The creation of Exhibitor catalogues for the fairs</li> <li>• Fair logistics</li> <li>• Registration of participants to the webinars on the improvement of promotional activities</li> <li>• The communication with the National Agencies, including NAs meetings</li> <li>• Promotion/dissemination such publication of Testimonials, social media posts etc</li> <li>• Photo shoots for fair promotion materials and illustration of articles</li> </ul>
8	<b>Description of the categories of data subjects</b> <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 type="checkbox"/> Visitors to the Agency</p> <p><input checked="" 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 type="checkbox"/> Beneficiaries</p> <p><input checked="" type="checkbox"/> External experts</p> <p><input type="checkbox"/> Contractors</p> <p>Other, please specify: <i>Students; HEI Representatives; National Agencies representatives; fairs and event participants</i></p>

9	<p><b>Description of personal data categories</b></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><b>a) Categories of personal data:</b></p> <p><input checked="" type="checkbox"/> in the form of personal identification numbers</p> <p><input checked="" type="checkbox"/> concerning the physical characteristics of persons as well as the image, voice</p> <p><input type="checkbox"/> concerning the data subject's private sphere</p> <p><input checked="" 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><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 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><input type="checkbox"/> Other: please specify: <u>_N/A_</u></p> <p><b>b) Categories of personal data processing likely to present <u>specific risks</u>:</b></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><b>c) Categories of personal data whose processing is <u>prohibited</u>, with exceptions (art. 10):</b></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 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</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><b>d) Specify any additional data or explanatory information on the data being processed, if any:</b> <u>_N/A_</u></p>
10	<p><b>Retention time (time limit for keeping the personal data)</b></p> <p><i>As long as necessary and as short as possible. In line with the EC Retention list, contractual data may be kept up to 10 years after the last payment.</i></p> <p><i>The following retention may apply:</i></p> <p><b>1)</b> max 5 years after the end of the project (e.g. for data related to invoicing, etc.) for:</p> <ul style="list-style-type: none"> <li>- Fair registration Exhibitors,</li> <li>- Fair registration students,</li> <li>- Registration institutional event</li> <li>- Other participants in the fairs /event</li> <li>- Fair evaluation</li> <li>- Networking platforms, virtual communication tools</li> </ul>

	<ul style="list-style-type: none"> <li>- Communication to NA</li> <li>- Testimonials</li> </ul> <p>A- Annual NAT meetings</p> <p><b>2) After 6 months:</b></p> <ul style="list-style-type: none"> <li>- Virtual fair registration</li> </ul> <p>3) End of the project:</p> <ul style="list-style-type: none"> <li>- Fair logistics</li> <li>- Data on Teams</li> </ul> <p>For Webinar registration Data on Zoom is automatically deleted after 12 months. Exhibitor catalogue</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, indicate the further retention time: N/A</b></p>						
11	<p><b>Recipients of the data</b></p> <ul style="list-style-type: none"> <li>• EACEA: relevant staff members.</li> <li>• European Commission: relevant DGs in particular the Directorate-General for Education, Youth, Sport and Culture (DG EAC).</li> <li>• Relevant EU Delegations staff and other EU Institutions when relevant.</li> <li>• IT tools mentioned below will process data for the purpose of organising and managing events and other activities. If the data subjects are not willing to share personal data with these 3<sup>rd</sup> party tools, they are invited to use non personal data (anonymous or generic email addresses etc).</li> </ul> <p><b>Contractor :</b></p> <ul style="list-style-type: none"> <li>• <i>Campus France ("CF") 28 rue de la Grange aux Belles 75010 Paris France vAT FR 547 521954 38</i></li> </ul> <p><b>Consortium members:</b></p> <ul style="list-style-type: none"> <li>• <i>Deutscher Akademischer Austauschdienst Kennedyallee 50 53175 Bonn GERMANY</i></li> <li>• <i>Stichting Nuffic Kortenaerkade 11 2518 AX Den Haag NETHERLANDS</i></li> <li>• <i>Academic Cooperation Association Rue d'Egmont 15 1000 Bruxelles BELGIUM</i></li> <li>• <i>Sihtasutus Archimedes L. Koidula 13a 10125 Tallinn ESTONIA</i></li> </ul> <p>- For online fairs and institutional events, Consortium members have used the following third party tools: Zoom (professional accounts), <u>Meetyoo</u>, <u>EnPersonneVirtual</u>, and Wonder.me for online networking.</p> <p>Wonder.me was based in Germany. No data was transferred to wonder.me. A link was shared with participants and participants could enter the 'virtual room' with just adding a name. No registration was needed.</p> <p><u>Meetyoo</u> is based in Germany. Hereunder the link to their privacy policy:  <a href="https://www.meetyoo.com/en/privacy-policy-meetyoo-pro-show-organizer">https://www.meetyoo.com/en/privacy-policy-meetyoo-pro-show-organizer</a></p> <p>- Third party tools: Zoho (<a href="https://www.zoho.com/privacy.html?ireft=nhome&amp;src=home1-footer">https://www.zoho.com/privacy.html?ireft=nhome&amp;src=home1-footer</a>), Limesurvey ( <a href="https://www.limesurvey.org/privacy-notice">https://www.limesurvey.org/privacy-notice</a>), enPersonne (<a href="https://www.enpersonnevirtual.com/">https://www.enpersonnevirtual.com/</a>)</p> <table border="1" data-bbox="276 1532 1422 1841"> <thead> <tr> <th>Activities</th> <th>Tool</th> <th>Receiving partners</th> </tr> </thead> <tbody> <tr> <td>Fair registration Exhibitors</td> <td><a href="https://studyineuropefairs.eu/">https://studyineuropefairs.eu/</a>; LimeSurvey; Zoho</td> <td>CF, DAAD, Harno, Nuffic, go to And Play OÜ (manages fair registration (name, address country) and the overall platform and website functions)</td> </tr> </tbody> </table>	Activities	Tool	Receiving partners	Fair registration Exhibitors	<a href="https://studyineuropefairs.eu/">https://studyineuropefairs.eu/</a> ; LimeSurvey; Zoho	CF, DAAD, Harno, Nuffic, go to And Play OÜ (manages fair registration (name, address country) and the overall platform and website functions)
Activities	Tool	Receiving partners					
Fair registration Exhibitors	<a href="https://studyineuropefairs.eu/">https://studyineuropefairs.eu/</a> ; LimeSurvey; Zoho	CF, DAAD, Harno, Nuffic, go to And Play OÜ (manages fair registration (name, address country) and the overall platform and website functions)					

Fair registration students	<a href="https://studyineuropefairs.eu">https://studyineuropefairs.eu</a>	CF, DAAD, Harno, Nuffic, gotoAndPlay OÜ (manages fair registration (name, address, country, date of birth) and the overall platform and website functions)
Virtual fair registration	meetyoo EnPersonnevirtual	DAAD, Campus France, Nuffic, meetyoo, EnPersonnevirtual
Registration institutional event	<a href="https://studyineuropefairs.eu/">https://studyineuropefairs.eu/</a> , zoho, survey monkey, lime survey, framaforms,	CF, DAAD, Harno, Nuffic, gotoAndPlay OÜ (manages fair registration and the overall platform and website functions)
Other participants in the fairs /events	<a href="https://studyineuropefairs.eu/">https://studyineuropefairs.eu/</a> , zoho, survey monkey, email, google forms	CF, DAAD or Nuffic, service provider Harno (name, address, country, date of birth)
Photos of events		Partners in charge of organising events (CF, Nuffic, DAAD)
Fair evaluation	Zoho	CF
Fair evaluation	Zoho	CF
Networking platforms, virtual communication tools	Cisco WebEx, wonder.me zoom MS Teams	DAAD, CF
Exhibitor Catalogue	<a href="https://database.exhibitorcatalogue.com/">https://database.exhibitorcatalogue.com/</a> ; zoho, survey monkey	DAAD, CF, Nuffic (name of organisation)
Fair logistics	Email, Excel	DAAD
Webinar registration	Zoom, Excel	ACA
Communication to NAT	Email, Excel	CF
MS Teams	MS Teams	CF, ACA
Testimonials	SurveyMonkey	Nuffic, Harno
Annual NAT meeting	Zoho, MS office, zoom	CF, ACA or Harno
Photo shoot		ACA
Social media	Facebook, Instagram, and YouTube	Harno

	Gamification campaign solutions	https://studyineurope.adact.me/europequiz	Harno, Adact OÜ		
	<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"><li>- 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;</li><li>- The European Anti-Fraud Office (OLAF);</li><li>- The Internal Audit Service of the Commission</li><li>- The Investigation and Disciplinary Office of the Commission (IDOC)</li><li>- The European Court of Auditors</li><li>- The European Ombudsman</li><li>- The European Public Prosecutor's Office</li><li>- EU courts and national authorities</li></ul>				
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 IN Europe (Data collection)	Third parties / external service providers OUTSIDE Europe (data collection)	Third parties / external service providers IN Europe (data sharing)	Third parties / external service providers OUTSIDE Europe (data sharing)
	Fair registration Exhibitors	gotoAndPlay OÜ, Estonia  EnPersonne virtual, France  Meetyoo, Germany	NA	EnPersonne virtual, France  Meetyoo, Germany	Impler Agency - Social Media & Digital Communication, Azerbaidjan (name badges)  Rojas, Brazil  Local event manager South Korea: Gyungah LEE  WeDolt, Argentina COMMS Marina Gimenez, Argentina
	Fair registration students				Local event manager South Korea: Gyungah LEE
	Virtual fair registration	EnPersonne virtual, France  Meetyoo, Germany		certain information shared with exhibitors of the respective fairs	

	<b>Registration institutional event</b>				<p>Impler Agency - Social Media &amp; Digital Communication, Azerbaidjan</p> <p>Rojas, Brazil</p> <p>Local event manager South Korea: Gyungah LEE Name badge printing: Seojin Infotech</p> <p>WeDolt, Argentina COMMS Marina Gimenez, Argentina</p>	
	<b>Other participants in the fairs /events</b>				<p>Impler Agency - Social Media &amp; Digital Communication, Azerbaidjan</p> <p>Rojas, Brazil</p> <p>Local event manager South Korea: Gyungah LEE Name badge printing: Seojin Infotech</p> <p>WeDolt, Argentina COMMS Marina Gimenez, Argentina</p>	
	<b>Photos of events</b>	NA	NA	efil (annual report CF)	<p>Impler Agency - Social Media &amp; Digital Communication, Azerbaidjan</p> <p>Rojas, Brazil</p>	
	<b>Fair evaluation</b>	NA	NA	NA	NA	
	<b>Fair evaluation</b>	NA	NA	NA	NA	
	<b>Networking platforms, virtual communication tools</b>	NA	NA	NA	NA	

	<b>Exhibitor Catalogue</b>	Trio group, Germany	NA	Luciole, France	Impler Agency - Social Media & Digital Communication, Azerbaijan Rojas, Brazil
	<b>Fair logistics</b>	NA	NA	Schenker Deutschland AG, Germany	NA
	<b>Webinar registration</b>	NA	NA	NA	NA
	<b>Communication to NAs</b>	NA	NA	NA	NA
	<b>MS Teams</b>	NA	NA	NA	NA
	<b>Testimonials</b>	Mometive Europe UC	NA	NA	NA
	<b>Annual NAs meeting</b>			security services (Quai d'Orsay, France) to allow the attendance since the meeting took place in French public premises	
	<b>Photo shoot</b>	OÜ Aisting	NA	NA	NA
	<b>Social media</b>		Facebook, Instagram, and YouTube		
	<b>Gamification campaign solutions</b>	Adact OÜ	NA	NA	NA

For the place of the events/fairs, transfer of data outside the EU concern 4 countries: Argentina, Azerbaijan, Brazil, South Korea.

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

Transfers to Argentina and South Korea are covered by adequacy decisions (Article 47 of the Regulation).

For transfer of data to Brazil and to Azerbaijan, they are based on Article 50 of the 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 in order 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 Union and Article 26 of the Universal Declaration of Human Rights). The Erasmus Programme funding this process encourages the participation of young people in Europe's democratic life, including 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)).

For the use of IT tools such as Zoom the adequacy decision with the US applies.



13	<p><b>General description of the technical and organisational security measures</b></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> <p><b>Contractors:</b></p> <p>EACEA's contractors have contractual obligations to comply with data protection rules and to put the appropriate security measures to protect the personal data being processed.</p>
14	<p><b>Information to data subjects / Data Protection Notice (DPN)</b></p> <p><i>The information on the processing is made available to the data subjects through a DPN.</i></p>