



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°

07 - 2022

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.

Online Language Support (OLS)	
1	Last update of this record (where applicable) 06/07/2022
2	Short description of the processing 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. A Service Level Agreement (SLA) between the JRC Directorate – General and EACEA was signed for the use of the platform, delivery and provision of business services (Ares(2021)4985252). 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

	<p>exchanges through building communities of learners and raise linguistic interest in the EU as a whole through audiovisual content.</p> <p>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.</p> <p>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 moderating the OLS communities. 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).</p> <p>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.</p> <p>Personal data on EU Academy are collected in three ways:</p> <ol style="list-style-type: none"> 1. data of Erasmus+ and European Solidarity Corps individuals in mobility encoded in DG EAC IT tools (BM and PMM) that are transferred to EU Academy. 2. beneficiary institutions/organisations (learning managers) and teacher/trainers introducing in EU Academy personal data of Erasmus+ and European Solidarity Corps individuals in mobility. 3. registration as users on EU Academy with EU login in order to access the OLS open and core area in the EU Academy
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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>European Education and Culture Executive Agency (EACEA)</p> <p>Person designated as being in charge of the processing operation in EACEA: Head of Unit A.6 Platforms, Studies and Analysis</p> <p>EACEA-ONLINE-LANGUAGE-SUPPORT@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>N/A</p>
6	<p>Name and contact details of processor (where applicable)</p> <p>The following contractors and sub-contractors of EACEA act as data processors:</p> <p>For Lot 1 responsible for core and open learning content:</p> <p>Centre de Langues à Louvain la Neuve et en Woluwe (CLL) ASBL Place de l'Université 25, 1348 Louvain la Neuve, Belgium</p>

	<p>Tél.: +32 (0)10 47 06 06 https://www.cll.be/fr/cll-centres-de-langues CLL's Data protection Contact Point: E-mail: dp-cc@cll.be mailto:DP-CLL@cll.be mailto:g.boogaert@cll.be</p> <p>For Lot 2 responsible for community management, open video production and communication/promotion</p> <ol style="list-style-type: none"> 1. European Service Network SA Galerie Ravenstein 4, 1000 Brussels, Belgium ESN's Data Protection Contact: Tel.: +32 (0)477 31 85 96 Tel.: +32 (0)2 307 79 06 E-mail: smb@esn.eu; dpo@esn.eu 2. Berlitz Language and Business Training SARL Grand Rue 89 93, 1661 Luxembourg, Luxembourg Berlitz's Data Protection Officer: Steen Kirkby Tel.: +45 36 99 24 30 E-mail: steen.kirkby@berlitz.dk 3. Tremend Benelux S.A. Rue de Strasbourg, n° 68, 2560 Luxembourg, Luxembourg Tremend's Data Protection Contact point: Tel.: +40720450085 Tel.: +40212237700 E-mail: support@tremend.com mailto:emil.dumitrache@tremend.com <p>The Directorate-General for Communications Networks, Content and Technology (DG CNECT) of the European Commission for the use of Newsroom to send newsletters. Email address: CNECT-NEWSROOM-SUPPORT@ec.europa.eu</p>
7	<p>Purpose of the processing</p> <p>The data processing is necessary to:</p> <ul style="list-style-type: none"> • 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. <p>In addition:</p> <ul style="list-style-type: none"> • 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.
8	<p>Description of the categories of data subjects</p>

	<p>Whose personal data are being processed?</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 checked="" 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 type="checkbox"/> External experts</p> <p><input type="checkbox"/> Contractors</p> <p><input checked="" type="checkbox"/> Other, please specify:</p> <ul style="list-style-type: none"> • Erasmus+ and European Solidarity Corps participants. • Erasmus+ and European Solidarity Corps beneficiary institutions/organisations and language teachers/trainers • Erasmus+ and European Solidarity Corps National Agencies staff • Community managers (EU) • EACEA, DG EAC staff (EU)
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>Mandatory: personal mobility identifier, nationality</p> <p><input checked="" type="checkbox"/> concerning the physical characteristics of persons as well as the image, voice or fingerprints</p> <p><i>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.</i></p> <p><i>Mandatory: The teaching videos for language courses and videos featuring cultural and historical elements of programme countries' languages include images and voices of actors.</i></p> <p><input checked="" type="checkbox"/> concerning the data subject's private sphere</p> <p><i>Optional: personal data that OLS users may disclose upon discussing (e.g., in chats, forums, learning communities, mentoring groups) and in helpdesk inquiries.</i></p> <p><i>Mandatory: signatures and personal data of actors and voice actors in the authorisation forms for use of photographs/videos, voice recording and for archiving purposes.</i></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 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><i>Mandatory: For learners, country of destination and estimated start and end of the mobility period, type of mobility</i></p> <p><input type="checkbox"/> concerning social security and pensions</p> <p><input type="checkbox"/> concerning expenses and medical benefits</p> <p><input checked="" type="checkbox"/> concerning telephone numbers and communications</p> <p><i>Optional: Telephone numbers of contact persons of National Agencies and Beneficiary institutions/organisations</i></p> <p><input checked="" type="checkbox"/> concerning names and addresses (including email addresses)</p> <p><i>Mandatory: first and last names and email address of OLS National Agency contact persons, beneficiary institutions/organisations contact persons, mobility participants, community managers and trainers. For videos, first and family names, address, and country of actors, voice actors and script writers.</i></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 checked="" type="checkbox"/> revealing racial or ethnic origin (<i>optional</i>)</p> <p><input type="checkbox"/> revealing political opinions</p> <p><input checked="" type="checkbox"/> revealing religious or philosophical beliefs (<i>optional</i>)</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>The above may be incidentally revealed in photos, videos or audiovisual recordings. In the framework of the OLS processing operation, such categories of personal data will not be collected by default.</p> <p>d) Specify any additional data or explanatory information on the data being processed, if any:</p> <p>_____</p>
10	<p>Retention time (time limit for keeping the personal data)</p> <p>Data encoded in DG EAC's IT tools (BM and PMM) and shared with EACEA:</p> <p><u>Mobility participants personal data such as:</u></p> <ul style="list-style-type: none"> • 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). <p><u>National Agencies and Erasmus+/European Solidarity Corps beneficiary institutions/organisations:</u> first and last names of contact person, contact person telephone number, contact person email address.</p> <p>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</p> <p><i>"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</i></p>

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 address) 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 (such as last name, first name, signature, address, country, visual and voice recording) is of 10 years from the day of the signature of the release form.

The voice recording may be hosted and / or published on the VIMEO and on European Commission (EC) websites, EC corporate platforms and/or EC social media accounts for up to 10 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 10 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](#).

Is any further processing for historical, statistical or scientific purposes envisaged?

yes no

If yes, indicate the further retention time: N/A

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Recipients of the data

Access to personal data and other information such as language, 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 email address) and data for communication, support, research and statistical purposes.
- **Authorised staff of the processors identified** in section 6 and their providers (sub-processors) who act on behalf and under the instructions of EACEA: e.g., first and last name, contact email 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 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 email address) and of individual mobility participants (e.g.: first and last names, contact 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](#)). In order to deliver its service, Vimeo will act as separate controller for the processing of personal data on which they determine the means and the purposes, and might transfer personal data outside the EU in accordance with their privacy policies.

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

	<ul style="list-style-type: none"> • 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. <p>Whenever possible, data will be processed in an anonymous way, especially if transferred to third parties for research purposes.</p> <p>Personal data will never be used for marketing purposes.</p>
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>EACEA does not transfer personal data to third countries or international organisations.</p>
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><u>1. Organisational measures:</u></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 recommended by DG 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><u>2. Technical measures:</u></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>
14	<p>Information to data subjects / Privacy Statement</p> <p>EACEA privacy statement: https://www.eacea.ec.europa.eu/about-eacea/eacea-platforms_en</p> <p>A link leading to the EACEA OLS privacy statement is included in the email sent to users (learners, teachers/trainers, National Agencies and beneficiary institutions and organizations) inviting them to register on EU Academy in order to benefit from the OLS language courses and/or to register to OLS the newsletters</p>