



EUROPEAN COMMISSION
Education, Audiovisual and Culture Executive Agency

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°

003-2020

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.

Learning and development activities	
1	Last update of this record (where applicable) N/A
2	Short description of the processing The learning and development strategy of the Agency allows staff members to broaden and improve their skills and knowledge. To organise all learning and development activities, the HR Unit processes selected personal data of the staff members, trainees, interim, prestataires and external contractors, who are involved in organising and participating in the courses and additional activities.
Part 1 - Article 31 Record	
3	Name of the Controller Unit(s) and/or function of person acting on behalf of the Controller Controller: Education, Audiovisual and Culture Executive Agency

	Unit(s): Unit R1 (People, Workplace and Communication) EACEA-HR@ec.europa.eu
4	Contact details of the Data Protection Officer (DPO) EACEA-data-protection@ec.europa.eu
5	Name and contact details of joint controller (where applicable) N/A
6	Name and contact details of processor (where applicable) Directorate-General for Human Resources and Security (DG HR) – owner and provider of the corporate Learning Management System “EU Learn” HR-EU-LEARN@ec.europa.eu
7	Purpose of the processing Learning and development is an integral part of the professional activity of staff members. It is an essential investment of the Agency, meant to improve and expand staff competences, knowledge and attitudes, as well as effectiveness and quality of the organisation as a whole.
8	Description of the categories of data subjects 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) <input checked="" type="checkbox"/> Agency staff (Contractual and temporary staff in active position) <input type="checkbox"/> Visitors to the Agency <input checked="" type="checkbox"/> Contractors providing goods or services <input type="checkbox"/> Applicants <input type="checkbox"/> Relatives of the data subject <input type="checkbox"/> Complainants, correspondents and enquirers <input type="checkbox"/> Witnesses <input type="checkbox"/> Beneficiaries <input type="checkbox"/> External experts <input checked="" type="checkbox"/> Contractors <u>external trainers</u> <input checked="" type="checkbox"/> Other, please specify: <u>trainees, interim, prestataires</u>
9	Description of personal data categories 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): <i>a) Categories of personal data:</i> <input checked="" type="checkbox"/> in the form of personal identification numbers <u>personnel number</u> <input type="checkbox"/> concerning the physical characteristics of persons as well as the image, voice or

	<p>fingerprints</p> <p><input type="checkbox"/> concerning the data subject's private sphere</p> <p><input checked="" type="checkbox"/> concerning pay, allowances and bank accounts <u>bank account number, bank name and address (for staff in external training, when they need to be reimbursed, of external trainers/coaches/companies for the payment of the training delivered)</u></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 <u>motivation for participation in activity, objectives for participation in activity, seniority in the office, statutory link</u></p> <p><input checked="" type="checkbox"/> concerning leave and absences <u>state of participation (present, absent, withdrawn – where applicable)</u></p> <p><input 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 checked="" type="checkbox"/> concerning telephone numbers and communications <u>professional phone number, email address</u></p> <p><input checked="" type="checkbox"/> concerning names and addresses (including email addresses) <u>first name, last name, administrative status, grade, unit, office number, address of staff and trainers/coaches/companies</u></p> <p>Other: please specify:</p> <p><i>b) Categories of personal data processing likely to present specific risks:</i></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><i>c) Categories of personal data whose processing is prohibited, with exceptions (art. 10):</i></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</p> <p>For the preparation of catering for team buildings, the EACEA R1 Unit asks the concerned unit to provide information on food allergies and other dietary restrictions (vegetarian, vegan, etc.). The names of staff members are not communicated to the contractor, but only how many persons are concerned by each diet constraint situation</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><i>d) Specify any additional data or explanatory information on the data being processed, if any:</i> _____</p>
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10	<p>Retention time (time limit for keeping the personal data)</p> <ol style="list-style-type: none"> 1. With regard to the internal training the lists of the participants present during the training are kept in a specific folder four years (CRL 12.3.4) 2. The contracts concluded with the external contractors, containing the data of the external trainer are kept for at least five years from the date on which the European Parliament gives discharge for the financial year to which the documents relate (art. 75 Financial Regulations) 3. The trainers' CVs are kept in a specific folder (paper, electronic) for 1 year, then eliminated 4. The proof of ability to work in a third language is kept in personal file of the data subject for 8 years after the extinction of all rights of the person concerned and of any dependants, and for at least 100 years after the recruitment of the person (CRL 12.3.7) 5. Documents (e.g. Excel file) used by EACEA HR for administrative and follow-up purposes relevant to this procedure are considered as working documents and kept up to 4 years, (CRL 12.3.4) <p>Is any further processing for historical, statistical or scientific purposes envisaged? <input type="checkbox"/> yes <input checked="" type="checkbox"/> no</p>
11	<p>Recipients of the data</p> <ol style="list-style-type: none"> 1. EACEA designated staff in HR 2. EACEA Heads of sector, Heads of Unit, Heads of Department (EU Learn training approval workflow) 3. EACEA Director 4. DG HR, EUSA Course managers (i.e. staff responsible for planning and organising courses) DG HR (provider of the Learning management System EU Learn) 5. External contractors, external trainers/coaches preparing the training session 6. EPSO designated staff– (evaluation of the third language under art 45 SR) 7. Job shadowing exercise - designated staff in other Institutions (Agencies and/or DGs)
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>N/A</p>
13	<p>General description of the technical and organisational security measures</p> <p>1. Organisational measures:</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 is 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 HR responsible person collects and places the documents either in a confidential file which is kept under locks in the HR offices accessible only to designated HR staff on a need-to-know basis, in the drive or in the system with limited access, or in the staff personal files, which are kept under locks accessible only to designated HR staff on a need-to-know basis.</p> <p>2. Technical measures:</p> <p>Technical measures include the use of secure equipment (e.g. cupboards in a locked room)</p>

	<p>and IT-tools (including secure connections, firewalls, etc.) The Agency's IT systems 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. In this context a specific 'Information Security Technology Plan' is reviewed annually with a view to describe the implementation of the above rules and guidelines in EACEA. The procedures set out in the document must be applied to the Agency's IT systems to ensure the security of the stored data and they are based on the European Commission's standards on security. Paper copies: the paper versions are stored in locked cupboards and then in the archives of a locked room. The Server Rooms of the Agency are equally protected and locked.</p>
14	<p>Information to data subjects / Privacy Statement</p> <p>Staff has access to the Privacy Policy published in EU Learn.</p> <p>The Agency published a privacy statement on the Learn & Development page on the Intranet.</p>