



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°

016-2019

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.

OLS Participant management	
1	Last update of this record (where applicable) The last update of the former notification form was 1/12/2014
2	Short description of the processing This record describes the processing of personal data of users implemented through the Erasmus+ Online Linguistic Support (OLS) service. The Online Linguistic Support (OLS) is part of the Erasmus+ and European Solidarity Corps programmes. The OLS platform aims to provide a secured and safe online environment for mobility participants to complete language assessments prior to their mobility period and upon their return, as well as to take language courses

Part 1 - Article 31 Record	
3	Name of the Controller Unit(s) and/or function of person acting on behalf of the Controller <p>The European Commission, represented by the Directorate-General for Education, Youth, Sport and Culture (DG EAC) on the one hand and the Education, Audiovisual and Culture Executive Agency (EACEA) on the other hand are joint controllers.</p> <p>Person designated as being in charge of the processing operations: Head of Unit A1 - Support for Policy Reform and Online Linguistic Support Email: address EACEA-EPLUS-OLS@ec.europa.eu</p>
5	Contact details of the Data Protection Officer (DPO) <p>EACEA-data-protection@ec.europa.eu</p>
6	Name and contact details of joint controller (where applicable) <p>The platform is steered by the European Commission, represented by the Directorate-General for Education, Youth, Sport and Culture and implemented by EACEA who is responsible for the management of OLS.</p>
7	Name and contact details of processor (where applicable) <p>Altissia on behalf of the OLS project Consortium (Centre de Langues, Universite Catholique de Louvain and Altissia International S.A.) support@erasmusplusols.eu 25 Place de l'Université 1348 Louvain-la-Neuve Belgium</p>
8	Purpose of the processing <p>The OLS purpose is to provide "a complete learning language service and a scheme for measuring progress in language competences through mobility. The other objective relates to the support of language learning prior to and during the mobility period, to the level which is useful for participant's purpose.</p> <p>More specifically, the data processing is necessary to:</p> <ul style="list-style-type: none"> • enable OLS to function; • allow OLS registrants to communicate and collaborate in the spirit of mutual trust and respect; • Send registered OLS users campaign emails (e.g. monthly newsletters, contest announcements) for motivational purposes, provided that users have given their prior consent; and, • extract aggregate data for statistical purposes.
9	Description of the categories of data subjects <p>Whose personal data are being processed?</p> <p><input checked="" type="checkbox"/> Agency staff (Contractual and temporary staff in active position)</p>

	<input type="checkbox"/> Visitors to the Agency <input 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 type="checkbox"/> Contractors <input checked="" type="checkbox"/> Other, please specify: Erasmus+ and European Solidarity Corps participants, Erasmus+ and European Solidarity Corps institutions/organisations, Trainers from Erasmus+ institutions/organisations and Erasmus+ and European Solidarity Corps National Agencies.
10	Description of personal data categories a) Categories of personal data: <input type="checkbox"/> in the form of personal identification numbers <input checked="" type="checkbox"/> concerning the physical characteristics of persons as well as the image, voice or fingerprints This refers to the photo that participants may choose to upload in order to participate in contests, and video assignments which are part of some OLS activities. <input type="checkbox"/> concerning the data subject's private sphere This refers to personal data that the participants may refer to themselves upon discussing (e.g. chats, fora) or carrying out their assignments (Videos/photos). <input type="checkbox"/> concerning pay, allowances and bank accounts <input type="checkbox"/> concerning recruitment and contracts <input type="checkbox"/> concerning the data subject's family <input checked="" type="checkbox"/> concerning the data subject's career <input type="checkbox"/> concerning leave and absences <input checked="" type="checkbox"/> concerning missions and journeys: country of destination and estimated start and end of the mobility period <input type="checkbox"/> concerning social security and pensions <input type="checkbox"/> concerning expenses and medical benefits <input checked="" type="checkbox"/> concerning telephone numbers and communications <input checked="" type="checkbox"/> concerning names and addresses (including email addresses) <input checked="" type="checkbox"/> Other: language level b) Categories of personal data processing likely to present <u>specific risks</u>: <input type="checkbox"/> data relating to suspected offences, offences, criminal convictions or security measures <input type="checkbox"/> data being used to evaluate personal aspects of the data subject (ability, efficiency, conduct)

	<p>c) Categories of personal data whose processing is <u>prohibited</u>, with exceptions (art. 10):</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 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>d) Specify any additional data or explanatory information on the data being processed, if any: _____</p> <p>- Mobility participants:</p> <ol style="list-style-type: none"> 1. Last name, first name, gender, contact e-mail, nationality, year of birth, mother tongue, type of mobility, language to test, country of destination, estimated start of the mobility period, sending institution, period of mobility, time zone, estimated end of the mobility; 2. Results of language assessments and courses; 3. Other data submitted on voluntary basis by participants of mobility on the OLS (e.g., messages in forums, online discussions and threads, files and pictures). <p>- Information relative to National Agencies and Erasmus+/European Solidarity Corps sending institutions/organisations: project contact person, project contact telephone number, contact project e-mail, number of licences for language assessments and number of licences for language courses.</p>
11	<p>Retention time (time limit for keeping the personal data)</p> <p>Data related to the profile of the user, are kept for a maximum of two years after the user's last login, after which his/her profile will be automatically deactivated permanently. All personal information is then made Anonymous.</p> <p>Data related to statistics and research purposes is kept for the entire duration of the OLS. At the end of the contract, the Consortium UCL – ALTISSIA – CLL will hand over all information and data to the EACEA and not keep a copy of confidential information, documents and personal data in whatever format. The data remain solely for research and monitoring purposes at the disposal of the EACEA, the European Commission, National Agencies and Erasmus+/European Solidarity Corps sending institutions/organisations, Altissia on behalf of the Consortium UCL – ALTISSIA – CLL and other third parties under the authorisation of the Data Controller in an aggregated format.</p> <p>Is any further processing for historical, statistical or scientific purposes envisaged? <input checked="" type="checkbox"/> yes <input type="checkbox"/> no</p> <p>If yes, indicate the further retention time: entire duration of the OLS.</p> <p>If the answer is yes, please go to Part 2, Storage and Security for technical safeguards.</p>
12	<p>Recipients of the data</p> <p>As a registered OLS user, optional data submitted by users, e.g., messages in forums, online discussions and threads, files and pictures posted onto the platforms will be visible to the other OLS registered users.</p>

	<p>Access to personal data may be given on a need-to know basis to the following recipients:</p> <ul style="list-style-type: none"> - European Commission, Directorate General Education and Culture (EAC), EACEA and National Agencies: aggregate data only. - Service provider and its providers who act on behalf and under the instructions of EACEA: full set of data. - Data related to individual mobility participants is accessible to their sending institution/organisation having an access to the backend licence management system OLS which can then decide on its use. - For EVS volunteers, the results will not be communicated to the other organisation(s) in the project. <p>Whenever possible, data will be processed in an anonymous way, especially if transferred to third parties for research purposes.</p> <p>Personal data collected will never be used for marketing purposes.</p>
13	<p>Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards?</p> <ul style="list-style-type: none"> - National Agencies taking part in the Erasmus+ and European Solidarity Corps programmes situated in third countries; - Respective Erasmus+ and European Solidarity Corps sending institutions/organisations situated in third countries.
14	<p>General description of the technical and organisational security measures</p> <p>The collected personal data and all related information are stored on secured servers of the service provider (Altissia) for the duration of the contract with the Consortium UCL – ALTISSIA – CLL.</p> <p>The operations of the service provider's computer centres contractually abide to the European Commission's security directives and provisions established by the Directorate of Security for these kinds of servers and services.</p> <p>The standard security measures exist for the site hosting the Altissia servers, i.e. most recently patched and updated operating system and software, antivirus protection, firewall, regular security auditing and network security scans, applied IT security policy, vulnerability testing and intrusion detection system.</p> <p>On the part of EACEA, information and training provided to staff with regard to the processing of personal data; code of conduct and confidentiality agreements to be respected by staff members. Technical measures are ensured by i.e. preventing unauthorised access to computer systems processing personal data, preventing any unauthorised reading, copying, alteration or removal of storage media.</p>
15	<p>Information to data subjects / Privacy Statement</p> <p>https://erasmusplusols.eu/en/privacy-statement/</p>