



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°

04-2019

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.

Collection and publication of personal data on Higher Education Reform Experts (HEREs)

1	Last update of this record (where applicable)
	The last update of the former notification was on 15 June 2015.
2	Short description of the processing
	The network of Higher Education Reform Experts (HEREs) is a pool of experts supporting the modernisation of higher education in countries neighbouring the EU. EACEA collects personal data related to Higher Education Reform Experts when nominated by the National Authorities and the National Erasmus+ Offices and in the Partner Countries. The data is stored by EACEA and transmitted to the service provider, the SPHERE team.

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 Head of Unit A4 Erasmus+: Higher Education – International Capacity Building E-mail: EACEA-EPLUS-CBHE-PROJECTS@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)
	The SPHERE team runs the HERE platform on behalf of the Education, Audiovisual and Culture Executive Agency (EACEA) SPHERE Coordinator - University of Barcelona Gran Via des les Corts Catalanes 585 - Barcelona, Spain here@ub.edu
7	Purpose of the processing
	<p>Higher Education Reform Experts (HEREs) constitute a network financed and coordinated through the Erasmus+ Programme. The experts are nominated by the National Authorities and National Erasmus+ Offices in the former Tempus Partner Countries, with the endorsement of the EU Delegations. The role of these experts is to promote the modernisation of higher education in their countries, by organising local activities with the support of the National Erasmus+ Offices. The EACEA organises regular training activities for the HEREs, through a service contract with an external service provider (the SPHERE team: "Support and Promotion for HEREs").</p> <p>EACEA collects and stores personal data of the experts nominated by the Partner Countries. Certain details are also collected by the SPHERE team when experts register on the portal of the Higher Education Reform Experts (https://supportthere.org/).</p> <p>The portal of the Higher Education Reform Experts provides a mechanism of information, communication and coordination, to ensure a smooth functioning of the national teams of Higher Education Reform Experts. The web platform serves as a communication tool for the expert community, as a source of information and as a registration website for events. The personal data is collected so that the Agency and its service provider, the SPHERE team, can have regular contacts with the members of the HERE network for training and information purposes. Making the personal data visible to registered users of the "Virtual Community" section of the website also facilitates networking between individual HEREs.</p>
8	Description of the categories of data subjects
	Whose personal data are being processed? <input type="checkbox"/> Agency staff (Contractual and temporary staff in active position) <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: Experts nominated by Partner Countries to promote higher education reform
9	Description of personal data categories
	<p>a) Categories of personal data:</p> <input type="checkbox"/> in the form of personal identification numbers <input type="checkbox"/> concerning the physical characteristics of persons as well as the image, voice or fingerprints <input checked="" type="checkbox"/> concerning the data subject's private sphere: Users can also submit photos and other information in the context of the exchanges on the platform and can post messages and other material in forums of the platform. <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 type="checkbox"/> concerning the data subject's career <input type="checkbox"/> concerning leave and absences <input type="checkbox"/> concerning missions and journeys <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 (telephone and fax numbers) <input checked="" type="checkbox"/> concerning names and addresses (including email addresses) <input checked="" type="checkbox"/> Other: title, academic title, gender, birth date, institution type, institution name, institution location, present position, qualification, field of expertise in higher education reform topics, academic field <p>b) Categories of personal data processing likely to present <u>specific risks</u>:</p> <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> <input type="checkbox"/> revealing racial or ethnic origin <input type="checkbox"/> revealing political opinions <input type="checkbox"/> revealing religious or philosophical beliefs

	<input type="checkbox"/> revealing trade-union membership <input type="checkbox"/> concerning health <input type="checkbox"/> genetic data, biometric data for the purpose of uniquely identifying a natural person <input type="checkbox"/> concerning sex life or sexual orientation d) Specify any additional data or explanatory information on the data being processed, if any: Data published in the Virtual Community: first name, last name, country, academic title, institution / organisation, role, expertise field.
10	Retention time (time limit for keeping the personal data) The personal data is kept on the portal of the Higher Education Reform Experts up to three years following the last login In case users request the deactivation of their profile or the profile is automatically deactivated, no data will be visible to other users. The data will be deleted if users with a deactivated profile want to continue using the platform, they will need to register again. Is any further processing for historical, statistical or scientific purposes envisaged? <input type="checkbox"/> yes <input checked="" type="checkbox"/> no
11	Recipients of the data The personal data received is accessible to services of the European Commission, EU Delegations, National Erasmus+ Offices, service provider (SPHERE team), registered users of the SPHERE platform. Other data submitted by users on the platform (e.g., messages in forums, online discussions and threads, files and pictures) are only visible to other registered users related to the area of the Portal where they have been uploaded.
12	Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards? No
13	General description of the technical and organisational security measures Organisational measures at EACEA include appropriate access rights and access control. Information and training has been provided to staff with regard to the processing of personal data. A general privacy policy is in place and there is a dedicated data protection officer. The service contract is managed by the University of Barcelona, which is obliged by Spanish law to apply a series of technical and organisations measures to ensure the protection of personal data. A data protection officer and a specific committee are responsible for ensuring that personal data are processed properly and kept secure in accordance with applicable regulations
14	Information to data subjects / Privacy Statement Privacy statement on the portal of the Higher Education Reform Experts: https://supportthere.org/page/privacy-statement