



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°

09-2020

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.

General Online Training (this part may be public)	
1	Last update of this record (where applicable) N/A
2	Short description of the processing The processing of personal data in the frame of the General Online Training (GOT) is required to allow the European Solidarity Corps (ESC) registered users to gain access to and participate in the General Online Training (GOT) platform and to undertake an aggregated analysis of responses to two types of satisfaction surveys collected via the GOT platform.
Part 1 - Article 31 Record (this part may be public)	
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.B3 <i>Youth, Volunteer Solidarity and Traineeships Office</i>) 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 operation: Head of Unit A.5 Youth, EU Solidarity Corps and Aid Volunteers Education, Audiovisual and Culture Executive Agency EACEA-SOLIDARITY-CORPS@ec.europa.eu</p>
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) <p>The Education, Audiovisual and Culture Executive Agency is responsible for the management of the General Online Training and joint controller together with the European Commission represented by the Directorate-General for Education, Youth, Sport and Culture.</p> <p>Contact details are those mentioned above.</p>
6	Name and contact details of processor (where applicable) <p>ICF SA Email: esc.got@icf.com</p> <p>UP learning, partner in the ICF consortium, data processor for the GOT platform within the meaning of the GDPR Email: security@uplearning.nl</p>
7	Purpose of the processing <p>Date processing is necessary for the following purposes:</p> <ol style="list-style-type: none"> 1. To ensure access to the General Online Training of the European Solidarity Corps for registered users of the European Solidarity Corps Youth Portal managed by DG EAC, to collect user feedback (users will be invited to complete a short survey questionnaire after completion of each course) and to enable reporting on the European Solidarity Corps training use; 2. To allow for the analysis of feedback and organise telephone interviews with users of the General Online Training (after completion of two courses they will be asked if they are interested in a follow-up interview); 3. To maintain contacts with the Youth Panel and candidate Youth Panel members. Each year, a call for participation in the Youth Panel will be launched, and up to 15 members are foreseen to be selected.
8	Description of the categories of data subjects <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: All registered users on the European Solidarity Corps Youth Portal, registered users agreeing to be interviewed as part of the feedback process and candidates and selected members of the Youth Panel.
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): a) Categories of personal data: <input checked="" 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 (<i>optional</i>) <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 (<i>in the framework of the call for expression of interest to become a member of the Youth panel</i>) <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 <input type="checkbox"/> concerning names and addresses (including email addresses) <input checked="" type="checkbox"/> Other: please specify: 1. <u>General platform access</u> : User name (mandatory), first name (mandatory), last name (mandatory), e-mail address (mandatory), language (mandatory), country of residence (mandatory), date of birth (mandatory), gender (mandatory), picture / avatar (not mandatory), information that may be of a personal nature stored in private files (not mandatory). These categories are directly taken from the European Solidarity Corps Youth Portal. <u>Feedback</u> : highest level of education, experience with Solidarity Corps 2. <u>Phone feedback interviews</u> : phone number (mandatory). 3. <u>Call for expression of interest to become a member of the Youth panel</u> : title, first

	<p>name, last name, date of birth, e-mail address, phone number, name of the organisation, job title, nationality, country of residence, city of residence, experience in EVS and ESC context, level of English, other languages, motivation to be Youth panel member, background experience in European Solidarity Corps, ideas for the General Online training, special dietary requirements, special access requirements, CV. All categories are mandatory.</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 checked="" type="checkbox"/> data being used to evaluate personal aspects of the data subject (ability, efficiency, conduct)</p> <p>This information is requested in the framework of the call for expression of interest to become a member of the Youth panel.</p> <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>Data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health or sexual orientation may be received only in as much as these data appear spontaneously in the CV provided by the data subjects. Those data are not processed, since they are not pertinent.</p> <p>d) Specify any additional data or explanatory information on the data being processed, if any: N/A</p>
10	<p>Retention time (time limit for keeping the personal data)</p> <p>Any personal data collected will not be kept longer than 1 month following the deletion of the user account and/or after when the data is no longer serving its original purpose. The maximum period of 1 month is proportionate and has been chosen as purging and deletion exercises will take place once per month.</p> <p>The FWC signed has a duration of 24 months starting from 26/08/2019, renewable twice for a 12-month period.</p> <p>1. GOT user data</p> <p>During this period of implementation, data will be retained up to 1 month after deletion of the users on the EYP.</p> <p>After receiving a deletion, the GOT will purge (anonymise) all personal data related to the profile. The users profiles in the European Solidarity Corps Youth Portal remain valid even if the user does not access the profile account for a long period of time provided that the user has not reached the upper age limit of eligibility to take part in the ESC. If she/he has reached this limit, the account will be deleted after 3 years in the Portal. Since the source of the GOT LMS user profiles is the Portal, this implies that the same rules will apply in the GOT LMS.</p>

	<p>Via the user profile in the GOT LMS, users of the GOT platform can contact the Data Privacy Officer, send a data request, export all personal data and/or request account deletion in the GOT platform. If the user asked his data be deleted in the EYP, the data is also deleted in the GOT platform.</p> <p>2. GOT feedback phone interviews</p> <p>During the implementation period, the phone numbers will be deleted within 1 month following the interview and all relevant data provided by the interviewee (i.e. the feedback) will be anonymised and the name of the interviewee replaced by a number.</p> <p>3. Youth Panel</p> <p>Regarding the data collected in the context of <u>the call for expression of interest to become a member of the Youth panel</u>, all data relating to candidates who are not selected will be deleted within 1 month after the completion of the selection process by the contractor for the provision of the European Solidarity Corps General Online Training.</p> <p>For the selected participants, personal information will be kept until 1 month after the end of mandate (1 year).</p> <p>In order to make any relevant practical arrangements (including travel), the consent of the data subject is required in the registration form and is indicated in the Statement of content for processing of personal data made available at the time of registration.</p> <p>Is any further processing for historical, statistical or scientific purposes envisaged?</p> <p><input type="checkbox"/> yes <input checked="" type="checkbox"/> no</p>
11	<p>Recipients of the data</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"> • Designated staff of the European Commission, Directorate General Education and Culture (DG EAC) • Designated staff of EACEA • Authorised staff of the contractor of the Framework services contract n° SI2.1334: consortium between ICF S.A., ICF Next S.A. UP learning B. V., MDF Training & Consultancy B.V, in particular System Administrators and technical engineers of UP learning (data for purpose 1 and 2), ICF project staff (data for purpose 2 and 3), MDF project staff (data for purpose 2) <p>The transfer of data to other third parties is prohibited. Personal data collected 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>No</p>
13	<p>General description of the technical and organisational security measures</p> <p><u>UP learning (for purpose 1)</u></p> <p>The General Online Training (Learning Management System platform) is located at the data centre in the Netherlands and is not cloud based. The datacentre is Tier3 equivalent certified and ISO/IEC 27001 and NEN 7510 certified.</p> <p>Physical and network access to the backend is only allowed for designated technical engineers of UP learning.</p> <p>UP is an ISO 27001 certified company and has implemented an Information Security Management Systems (ISMS). The scope of the ISMS focusses on develop, deliver and manage online learning solutions as adopted by the management of UP and in accordance</p>

	<p>with the Statement of Applicability version 2.0 (available at UP on request).</p> <p><i>Reporting obligation data leaks and security breaches</i></p> <p>In case of a suspected or actual (i) data leak; (ii) breach of security; (iii) breach of confidentiality or (iv) loss of confidential data UP will immediately, or within 24 hours, inform the individual or department designated by the customer after the initial discovery of the incident. UP will take all reasonable measures as per IT security plan at Part 6, point 2 of this data protection record, necessary to prevent (further) unauthorized inspection, modification and distribution or to prevent otherwise unlawful processing or reduce and terminate a breach of security, breach of confidentiality or further loss of confidential data and in the future, without prejudice to any right of the customer to compensation or other measures.</p> <p><u>ICF (for purposes 2 and 3):</u></p> <p>ICF is an ISO27001 accredited organisation.</p> <p>Data security is managed in accordance with ICF's Information Security policy which details comprehensive measures relating to: physical security, communications and operations management including network security management; access control including review of access rights, user authentication of external connections, equipment identification in networks, remote diagnostic and confirmation port protection and segregation in networks, incident management and business continuity management.</p> <p>ICF currently use Symantec Net Share for the secure storage and transfer of relevant sensitive data. On receipt, such sensitive electronic data is encrypted and held on a secure server, with access to it being restricted to members of specific project teams (using access control lists). No sensitive information is stored on the researcher's hard drives or other portable media - although all corporate endpoints are deployed with full disk encryption to mitigate the potential for data loss.</p> <p>All ICF's premises sit behind enterprise firewalls that restrict inbound and outbound traffic to authorised traffic and apply intrusion detection. In circumstances where full isolation is required, data is securely stored on a separate device that is removed from all network access (both internal and external [internet]).</p> <p>All systems require password authentication to access. Company policy dictates use of a 9-character minimum length, a mix of character types and this must be changed every 30 days.</p> <p>ICF has well developed procedures in place to ensure the secure transfer of sensitive electronic data between ourselves, clients and subcontractors where appropriate. Where sensitive data is transferred we use secure email, which allows encrypted data files to be emailed using public key cryptography. Where this is not possible we have several alternatives including authenticated transfer via TLS from corporate file share servers.</p>
14	<p>Information to data subjects / Privacy Statement</p> <p>The privacy statement is permanently available on the following websites:.</p> <p>General Online Training LMS : https://europeansolidaritycorpsgot.eu/disclaimer.php</p> <p>European Solidarity Corps Portal : https://europa.eu/youth/privacy_en</p>