



Eurydice

Data Protection Notice

The European Education and Culture Executive Agency ("EACEA") is committed to preserving the protection of your personal data. This notice provides information on your rights in relation to data protection and on how your personal data are processed by EACEA in accordance with Regulation (EU) No 2018/1725 on the protection of personal data by the Union institutions, bodies, offices and agencies¹ ("the Data Protection Regulation").

1. Who is responsible for processing your personal data (data controller)?

The controller is EACEA, BE-1049 Brussels

The person designated as being in charge of the processing operation is the Head of Unit A6

The contact Email address is eacea-eurydice@ec.europa.eu

For which purpose do we process your data?

Eurydice is a network tasked to explain how education systems are organised and work in Europe. It gives the opportunity to publish descriptions of national education systems, comparative studies devoted to specific topics on education and indicators and statistics in the field of education. In addition, the Mobility Scoreboard is a tool created to monitor progress toward the mobility targets set by the EU within the education and training sectors. Since, Eurydice includes the Mobility Scoreboard this Record will apply to it as well. Both tools are under the responsibility of EACEA A6 which produces the reports in partnership with the National Units (grant beneficiaries' network). The National Units have access to the back office of the platform through the EU login and engage in activities conducted on the MS Teams platform. The website development is carried out by different contractors (see below section on recipients for more info).

Your personal data are collected and used to operate Eurydice and provide related services such as:

- Handle helpdesk inquiries and surveys
- Allow and develop outreach, communication and collaboration
- Facilitate the follow-up and monitoring of activities of the community and the performance of ongoing activities disseminated on the Platform
- Send newsletters related to the Platform to inform on updates and relevant information on the European Commission's initiatives
- Enable online trainings – both organisation and implementation
- Enable and improve the user experience within this (and similar future) project(s) developed by the European Commission and EACEA via access control, tracking of usage frequency, search behaviours, preferences and settings

¹ 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 Text with EEA relevance, OJ L 295, 21.11.2018, p. 39.

- Provide aggregated statistics, including, but not limited to, the number of users during a specific period, the preferred subjects and/or countries chosen by users and account usage, to evaluate the access patterns and user preferences / requirements
- Produce and disseminate videos and pictures featuring interviews with experts
- Allow the publication of articles on the Platform
- Evaluate and support the security and correct operation of the Platform, and the lawfulness of its use
- Engage members in the Community activities on the MS Teams platform and allow them to communicate, network and collaborate through posts, reactions and chats
- Engage external speakers to participate in Eurydice events and seminars both in person and online.
- Collect testimonials (in video or writing) for communication purposes
- Organise various events (seminars, webinars, conferences, trainings, etc) in the context of Eurydice
- Collaborate for Newsletters (Newsroom). with international organisations such as OECD and CEDEFOP
- Edit country news and country pages (national descriptions) on the Eurydice website

This is because EACEA is mandated by the European Commission to implement the ERASMUS Programme, more specifically the day-to-day management of the relevant networks such as Eurydice.

Your personal data will not be used for an automated decision-making including profiling.

2. Which personal data are processed?

In order to carry out the processing operation, the following data may be processed:

- personal identification numbers (IDs, passport, etc)
- contact details (names and addresses (including email addresses)
- registration data/participation to meeting, etc
- physical characteristics of persons: image and voice for video recording and/or photos
- allowances and bank accounts
- info concerning the data subject's career
- data subjects' missions and journeys
- data subjects' communications via phone, emails etc.
- geo/localisation, IP address, etc.
- health related data such as food allergies and accessibility to buildings

3. Who has access to your personal data and to whom is it disclosed?

Access to your personal data is provided to the EACEA staff responsible for carrying out this processing operation and to any authorised staff according to the “need to know” principle. Such staff abide by statutory confidentiality obligations.

The following recipients may also access your personal data:

- Authorised staff of the European Commission: DG EAC, DG CNECT (acting as processor for EACEA for the use of Newsroom) and DG DIGIT (acting as processor for EACEA and its contractor (Microsoft) for the use of TEAMS (see [Privacy Statement for M365](#)) and other EU institutions and bodies.
- Authorised staff of OECD, in the scope of the studies performed by EACEA, on behalf of the Eurydice network, performs every year in collaboration with the OECD Office in Paris and its dedicated network on education policies. The collaboration entitles that every year one organisation is leading on the development of the study and the interaction with the

representatives of both networks. In order to allow the interaction with the network, members contact details are shared and exchanged.

- Authorised staff of the EACEA contractors acting as processors, namely: WESTPOLE Belgium NV, Capgemini, ARHS Developments, European Service Network SA (ESN) and Ecorys Europe EEIG – GEIE that abide by contractual confidentiality requirements. For more information on how your data may be processed by them, please have a look at their privacy statement [Privacy Policy - WESTPOLE Belgium NV](#), [Data Protection Policy | Management And Governance | Capgemini](#), [Privacy | Arns Group - ARHS](#), [Privacy statement | ESN](#), [Privacy | Ecorys](#). Please note that only the data mentioned in this data protection and in line with the conditions stipulated herewith are processed by the contractors
- Relevant staff of National Agencies, members (e.g. beneficiaries, etc) of the related TEAMS community, etc.)
- Public access for data published on National Policy Platforms website and/or on the social media of Eurydice (X, Facebook, etc) under their applicable privacy statement

The controller may transfer your personal data to the following recipients in countries outside the EEA such as Albania, Bosnia and Herzegovina, Georgia, Moldova, Montenegro, the Republic of North Macedonia, Serbia, Switzerland, Turkey and Ukraine. The National Units part of the Eurydice Network will receive this data when necessary. Data may be transferred to the same categories of recipients listed above.

The personal data is only transferred if required as part of the implementation of the activities. These transfers are necessary because some grant beneficiaries from the Eurydice network are based outside the European Union (EU) or the European Economic Area (EEA).

The transfer to Switzerland is based on the Adequacy Decision of the EC.

For the other countries the transfer will be based on derogations as per Article 50 of the Data Protection Regulation, namely:

- explicit consent of the data subject(s)
- the transfer is necessary for important reasons of public interest and is based on Article 50(1)(d) of the Regulation as recognised in the following Union law.:
- Article 14 of the Charter of Fundamental Rights of the European Union,
- Article 26 of the Universal Declaration of Human Rights,
- Article 11 of the Treaty of the European Union
- Article 15 of the Treaty on the Functioning of the EU

The Erasmus+ Programme funding this process encourages the participation of young people in Europe's democratic life, including by supporting activities that contribute to citizenship education and participation projects for young people to engage and learn to participate in civic society, thereby raising awareness of European common values (see Recital n° 28 of the Erasmus Regulation (Regulation (EU) 2021/817)).

In the context of the use of TEAMS and SLIDO, the adequacy decisions of the Commission with the U.S and for SLIDO also with the UK will apply. The use of SLIDO may indeed imply the possible transfer of your data to the U.S. and to the U.K. since SLIDO was acquired by CISCO.

The information we collect will not be given to any third party, except to the extent and for the purpose we may be required to do so by law.

In addition, data may be disclosed to public authorities in accordance with Union and Member State law such as the European Court of Justice, the relevant national judge as well as the lawyers and the agents of the parties in case of legal proceedings, the Investigation and Disciplinary Office of the

European Commission (IDOC), the competent Appointing Authority in case of a request or a complaint lodged under Articles 90 of the Staff Regulations, the European Anti-Fraud Office (OLAF), the Internal Audit Service of the Commission (IAS), the Court of Auditors, the European Ombudsman, the European Data Protection Supervisor (EDPS) and the European Public Prosecutor's Office (EPPO).

4. How long do we keep your personal data?

EACEA only keeps your personal data for the time necessary to fulfil the above-mentioned purpose and follows the Common Retention List of the European Commission.(CRL).

A. For the National Units registered on Eurydice, their contact details are kept for three years. After these three years, these contacts details will be erased.

Any personal data the user may have inserted through third parties' tools (e.g. during an online course when using an external online tool, such as Facebook or X) may be stored and processed by that third party. Such processing does not fall within the scope of this Record and is therefore not affected by the erasure.

B. Regarding certain data processing activities carried out in relation to the Eurydice, specific data retention periods apply, such as:

- **Personal data regarding dietary/access requirements of the participants in onsite events are deleted promptly at the conclusion of the event concerned.**
- **Up to six months:**
 - For, personal data collected on the MS Teams, the Identification data is stored for as long as the member's account is active. The retention period for content data in MS Teams and any personal data included therein is up to 180 days upon expiration / termination of the subscription. Diagnostic data is kept for up to 5 years upon expiration / termination of the subscription.
- **Maximum of two years after the end the current service contract, including the periods of extension:**
 - Personal data collected through the EUSurvey/MS Forms tool for registration to events.
 - Personal data collected for the purposes of producing videos, podcasts and photos of interviewees are only used in information / publicity materials produced.
 - Personal data related to the organisation and management of the events or webinars (this includes the information given during the registration, prior, during or after the event or webinar) as well as live-streaming and audio-visual recordings of events or webinars, for the purpose of sharing further information with the participants on future related events or webinars.
- **Five years:**
 - Personal data (first name, last name, job position, organisation, country of residence, e-mail address) of persons, who will register to receive the Eurydice Newsletters, will be kept for five years after registering to the Newsletter. For subscribers it counts from the last subscription date or last change in his/her subscription. It is important to note that receiving a newsletter or a notification item is not considered an "interaction" for this purpose.
- **Ten years:**
 - Personal data concerning contractual aspects, payments, activities and missions and journeys to comply with the audit / accounting obligations of the responsible data processors.

5. How do we protect and safeguard your personal data?

Relevant organisational and technical measures are taken by EACEA to ensure the security of your personal data.

Technical measures include appropriate actions to address online security, risk of data loss, alteration of data or unauthorised access, taking into consideration the risk presented by the processing and the nature of the personal data being processed.

Organisational measures include restricting access to the personal data solely to authorised persons with a legitimate need to know for the purposes of this processing operation. Access to your data is done via authentication system on an individual basis through user-ID and password. Your data resides on the servers of the European Commission, which abide by strict security measures implemented by the European Commission (DG DIGIT) to protect the security and integrity of the relevant electronic assets. EACEA is also bound by Commission Decision 2017/46 of 10/1/17 on the security of communications & information systems in the EC.

EACEA's contractors are bound by a specific contractual clause for any processing operations of your data on behalf of the Commission, and by the confidentiality obligations deriving from the transposition of the General Data Protection Regulation in the EU Member States ('GDPR' Regulation (EU) 2016/679).

6. What are your rights concerning your personal data and how can you exercise them?

Under the provisions of the data protection regulation, you have the right to request to the controller to access the personal data that EACEA holds about you and to have your personal data rectified in case your personal data are inaccurate or incomplete.

Where applicable, you have the right to request the erasure of your personal data and to restrict the processing of your personal data.

You are also entitled to object to the processing of your personal data on grounds relating to your particular situation at any time unless EACEA demonstrates compelling and overriding legitimate grounds or in case of legal claims.]

When processing is based on your consent, you have the right to withdraw your consent at any time, without affecting the lawfulness of the processing before such a withdrawal]

However, the data controller may restrict the rights of the data subjects based on article 25 of the Data Protection Regulation (in exceptional circumstances and with the safeguards laid down in the Regulation. Such restrictions are provided for in the internal rules adopted by EACEA and published in the [Official Journal of the European Union](#).²

Such a restriction will be proportionate, limited in time, and respect the essence of the above-mentioned rights. It will be lifted as soon as the circumstances justifying the restriction are no longer applicable. In principle, you will be informed on the principal reasons for a restriction unless this information may cancel the effect of the restriction. A more specific data protection notice may apply in such case.

² <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32021Q0317%2801%29>

7. Contact Information

If you have questions or wish to exercise your rights under the Data Protection Regulation or if you want or to submit a complaint regarding the processing of your personal data, you are invited to contact the Data Controller (see contact details above).

You can also contact the Data Protection Officer of EACEA at the following email address: eacea-data-protection@ec.europa.eu.

You may lodge a complaint with the European Data Protection Supervisor: <http://www.edps.europa.eu>.

8. On which legal basis are we processing your personal data?

We process your personal data, because:

- processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Union institution or body (as laid down in Union Law);

The following Union laws are the basis for such processing:

- Council Regulation 58/2003 of 19 December 2002, laying down the Statute for executive agencies to be entrusted with certain tasks in the management of EU programmes ;
- Commission Implementing Decision (EU) 2021/173 of 12 February 2021 establishing the European Education and Culture Executive Agency;
- Commission Decision C(2021)951 of 12 February 2021 delegating powers to the European Education and Culture Executive Agency with a view to the performance of tasks linked to the implementation of Union programmes in the field of education, audiovisual and culture, citizenship and solidarity;
- Regulation (EU) 2021/817 establishing the Erasmus+ programme.

The following special category of personal data is being processed: health data (diet requirement, accessibility requirement to enter a building, etc). We process this special categories of personal data, because the data subject has given explicit consent to their processing for the purpose of accessing to physical events and related activities .