



EUROPEAN EDUCATION AND CULTURE
EXECUTIVE AGENCY (EACEA)

Erasmus+ International Student and Alumni Networks

Data Protection Notice

The European Education and Culture Executive Agency ("EACEA") is committed to preserving your privacy. All personal data are dealt with 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").

The following Data Protection Notice outlines the policies by which the EACEA collects, manages and uses the personal data of the concerned individuals within the *Erasmus+ International Student and Alumni Networks*.

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

The controller is the European Education and Culture Executive Agency, BE-1049 Brussels
The person designated as being in charge of the processing operation is the Head of Unit A.4, International Capacity Building
Email: EACEA-EPLUS-ALUMNI@ec.europa.eu

2. Which personal data are processed?

a) Categories of personal data:

☒ in the form of personal identification numbers

ID passport or identity card numbers: date of issue and expiry date may be collected, so that the data subjects may obtain access to the premises where the meeting/event is held

☒ concerning the physical characteristics of persons as well as the image or voice

Network members may voluntarily submit or share their image and voice during online events, in videoconferencing, audio calls, video recordings and/or podcasts. They may decide to voluntarily share their picture(s) in public or private channels of the platform, e.g., as part of photo contests, news items, and event announcements. They may also voluntarily share their experiences, opinions, pictures and quotes for articles to be published within the platform.

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.

Speakers and participants who take part in online or physical events may have recordings, live-streaming and photographs of themselves taken during the events, to be used for promotion on the platform or social media accounts owned by the networks and managed by ICF. Data subjects can publish images of any other data subject only with their explicit consent.

☒ **concerning the data subject's private sphere**

At registration, network members may indicate their area(s) of interest. After registration, members may provide information on their personal motivation to join the network; they may post links and other resources that can belong to their private sphere, such as blogs or personal websites.

☒ **concerning pay, allowances and bank accounts (in case of reimbursement)**

To reimburse travel costs of fees for physical events, bank details/card number/bank account will be collected from event participants.

☒ **concerning recruitment and contracts**

☒ **concerning the data subject's career (University curriculum, professional position)**

All members will share their current professional role and field of work when registering. In the context of self-assessment activities, providing information on current institutional affiliation, professional role and field of work is mandatory as it serves to guide the mentoring and training.

Individuals can provide additional professional information, including on their experience and field(s) of expertise, as well as relevant achievements (e.g. job position, publication, course taught or a project managed).

In the context of preparations for events, participants may be asked to submit data regarding their experiences with the topic of the event and their intended follow-up actions after the event in survey questionnaires.

In the context of articles to be published online, on the Alumni Network platforms and social media accounts of the networks, participants may voluntarily share experiences, opinions, pictures and quotes.

☒ **concerning missions and journeys (travels organised within the alumni activities)**

[To be able to reimburse travel, accommodation and subsistence costs for physical events, information on itineraries and travel receipts need to be collected from participants.]

☒ **concerning telephone numbers and communications (mobile phone/phone number)**

[For organising travel, accommodation, or attending online events;

Optional: Community members may share on a voluntary basis their telephone numbers with other members on the platform; they may also share their social media handles.]

☒ **concerning names and addresses (including email addresses)**

To register, users must submit their first name, last name, function/title, country of residence, nationality, and e-mail, address. To request technical support, users must submit their first name, last name and e-mail address.

☒ **Other: please specify:**

- Analytical data related to survey responses is collected.
- Technical identifiers: To ask for assistance when facing technical problems with the platform, registered members may share screenshots providing information about their personal computers, internet connection and account settings, such as IP addresses and account usernames.

c) Categories of personal data whose processing is prohibited, with exceptions (art. 10):

☒ **concerning health**

Participants may voluntarily share their food preferences (vegetarian options, etc.) or specific access requirements when registering for physical events.

3. For which purpose do we process your data?

The purpose of the processing is to support the networks of the Erasmus+, including facilitating peer learning, exchange and knowledge-building activities, as well as providing information about the network and its events/activities. The online web presence fosters the sharing of knowledge and experience, connects education stakeholders and stimulate collaboration among various Erasmus+ International Alumni networks.

The personal data collected is required:

- i. To invite the Alumni to register as members and create user profiles on the platform;
- ii. To provide a collaborative online space among the members of the Alumni Network;
- iii. Inform & communicate about Alumni Network activities by means of newsletters;
- iv. To contact interested Alumni Network members regarding participation or contribution at an event and/ or to take part in mentoring activities, workshops, seminars, conferences, which may also be part of a process of selecting candidates for activities with limited numbers of participants ;
- v. To conduct surveys;
- vi. To develop and maintain a database of contact details of survey respondents, for reuse in successive stages of surveying for longitudinal surveys such as the Erasmus Impact Study, graduate tracking surveys and the Erasmus Mundus Graduate Impact Survey ('GIS');
- vii. To engage members in the Community activities on the platform and allow them to communicate, network and collaborate through posts, reactions and chats;
- viii. To organise and manage online events (e.g. workshops, web-seminars, stakeholder meetings and round tables, board meetings, general assemblies, trainings, mentoring activities, peer-learning) through audio-visual conferencing and/or recording;
- ix. To allow for the sharing of the meeting/event attendee list containing their name and affiliation among other participants, in order to create working groups to continue the collaborate work launched during the meeting/event;
- x. To offer and manage other online learning activities (e.g., self-assessments as part of the feedback after trainings);
- xi. To organise and manage physical events, including to contact the participants regarding organisational information (e.g., agenda, travel expenses, hotel, organising networking dinners and lunches in compliance with food allergies declared by participants); and to illustrate, promote or document the physical activities;
- xii. To document conducted activities and showcase the best digital solutions by submitting digital artifacts (e.g., minutes, publications, reports, news items, case studies and/or other outputs);
- xiii. To allow for the analysis of members' feedback on Community activities (the main objective being quality monitoring and improvement);
- xiv. To monitor and evaluate the Community's growth by keeping track of the number of members, also in relation to represented sectors of education and training and members' geographical location;
- xv. To inform about results and developments, upcoming events and/or other related initiatives of the EACEA/European Commission through a dedicated newsletter;

- xvi. To handle helpdesk inquiries and to provide technical support;
- xvii. To be able to provide inclusive and accessible settings at physical events;
- xviii. Management of email support, such as creating and providing email accounts for new board members and other network members who need them to conduct their network-related activities.

The personal data of registered members will not be used for any automated decision-making, including profiling.

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

Personal data will be made accessible on need-to-know basis to the authorised staff within the following recipients:

- EACEA.
- European Commission, such as: Directorate General Education and Culture (EAC), Directorate General International Partnerships (INTPA), Directorate General Neighbourhood & Enlargement Negotiations (NEAR)
- EU Delegations in third countries
- European External Action Service
- Contractor of the Framework services contract n° SI2.3707: consortium between ICF S.A. (BE) and BDO ADVISORY (BE)
- Board of the Alumni Networks: The applicable data protection notice of each Alumni Network website is published on each website as follows:
 - ASAF: [Privacy Policy | ASAF](#)
 - ESAA: [Legal mentions | ESAA \(esaa-eu.org\)](#)
 - EMA: [Privacy Policy & Terms of Use | Erasmus Mundus Association \(EMA\) \(em-a.eu\)](#)
 - OCEANS: [Legal mentions | OCEANS Network \(oceans-network.eu\)](#)
 - WBAA: [Legal Mentions | WBAA \(western-balkans-alumni.eu\)](#)
- Registered members of the Alumni Networks platforms
- General public (limited to the public website information and other publications for which the data subject has given consent to be used for communication purposes, including on social media)

Third party tools/service providers used for the organisation and management of the Alumni Networks and related activities (e.g., websites, surveys, events, newsletters):

- **Subcontractors**
 - Gray Dawes, based in the United Kingdom, serves as the travel agency used to book flights, link to Gray Dawes privacy policy: [here](#).
 - Selected hotels (identified on a case-by-case basis for each event)
 - PPW provider of data hosting for Alumni Networks websites (data centres in Germany and hosted by IONOS SE)
- **Third party tools**
 - Jotform platform or EU Survey: for the purpose of organising event registration, surveys, reimbursemet potform. Jotform [privacy policy](#).
 - *ICF has a data processing agreement (aligned with Art 28 GDPR requirements for processors) with Jotform entity established in the UK. In accordance with the terms of our data processing agreement, JotForm stores and processes data in data centres in the EU (Germany). Transfers do not apply unless notified and authorised*

in advance. Jotform has confirmed Jotform is pursuing to renew its EU-US Privacy Framework certification.

- Intuit Mailchimp and KG CleverReach GmbH & Co.: serve as the Alumni Networks newsletter tools.
 - link to Mailchimp privacy policy: [here](#)
 - link to Cleverreach privacy policy: [here](#)
- Microsoft TEAMS (for online events). ICF's O365 data is located in the EU.
- UNA CMS Alumni community platforms (as set up by GIZ/Mosaic consortium), used until the migration of the alumni platforms into the European Union's [EU Alumni platform](#) on Europa.
- Tools detailed in the data protection notices as network management/communication tools.

Only the data listed above will be processed by these subcontractors or third parties.

In addition, in case of control or proceedings, personal data can be shared with and processed by the bodies charged with a monitoring or inspection task in application of Union law in compliance with the applicable data protection rules and within the scope of their tasks entrusted by the relevant legislation. This includes, in particular, the following recipients:

- The European Court of Justice or a national judge as well as the lawyers and the agents of the parties in case of a legal procedure;
- The European Anti-Fraud Office (OLAF);
- The Internal Audit Service of the Commission
- The Investigation and Disciplinary Office of the Commission (IDOC)
- The European Court of Auditors
- The European Ombudsman
- The European Public Prosecutor's Office
- European Data Protection Supervisory Authority
- EU / national authorities

In case of control or dispute the bodies charged with a monitoring or inspection task in application of Union law (e.g. Internal Audit Service, European Commission, OLAF, EU Courts etc.).

In the context of online and onsite activities related to the management of the Alumni Networks including websites, events/meetings/ workshops/surveys/newsletter and communication, personal data will be transferred to:

- Gray Dawes in the United Kingdom (travel agency used to book travel). Such transfer is compliant with Regulation (EU) No 2018/1725, on the basis of the relevant European Commission's adequacy decision.
- For the organisation of certain events taking place outside of the EU, the booking of travels/accommodation of EU participants will require the collection and transfer of data to these third countries. Occasionally personal data (name/family name) of EU participants (if any) will be transferred to local hotels for booking purposes. Such bookings and subsequent transfers of EU personal data will be made upon, as applicable, on the EU Standard Contractual Clauses Module 1 (Controller to Controller) signed with the relevant hotel or on the explicit consent of the data subjects, (Art. 50.1(a.) of Regulation (EU) 2018/1725).
- For the following, transfer is based on the Adequacy Decision with the US:

- Intuit Mailchimp (newsletter tool) I certified under the EU-US Data Privacy Framework: <https://www.dataprivacyframework.gov/list>. Mailchimp compliance website is available here: [GDPR Compliance](#). Microsoft Teams used for the online events, workshops. ICF's O365 data is located in the EU. Microsoft is a US-based company and participates in the [EU-US Data Privacy Framework](#). Microsoft compliance website is available here: [General Data Protection Regulation Microsoft GDPR | Microsoft Docs](#)
- Temporary use of Google's Gmail and Google Workspace (network management/communication tool) - participates in the EU-US Data Privacy Framework list <https://www.dataprivacyframework.gov/list>

In case of transfers of personal data under a specific activity related to Alumni Networks should occur, this will be detailed in the data protection notice of the specific activity.

The transfer is necessary for important reasons of public interest as recognised in the Union law (Article 50.1.d of the Regulation).:

- 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/individuals 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)).

5. How long do we keep your personal data?

The Data Controller only keeps your personal data for the time necessary to fulfil the purpose of collection or further processing.

Period of storage:

- *Personal data collected to register to the platform:*
 - o Approved members: for as long as the member's account is active. Service generated data (log files) are kept for up to six months.
 - o Non-approved members: their data is fully erased six months after their rejection.

The personal data of the members of the platform is kept up to three years following the last login. In case members request the deactivation of their profile or the profile is automatically deactivated. Deactivated data will not be visible to other members. Deactivated data will be deleted. If deactivated members want, to use the platform again they must register anew as members.

- *Personal data gathered for online or physical events/workshops/ etc.:*

Data gathered for physical events, including survey responses (except regarding travel to/from the events, mentioned below) will be kept for six months. Live-streaming and audio-visual recordings of events will be kept for up to five years after the meeting or event.

Sensitive personal data relating to dietary and/or access requirements will be deleted as soon as they are no longer necessary for the purpose for which they have been collected in the framework of the meeting or event, but no later than maximum 1 month after the end of the meeting/ event/ workshop.

- Personal data concerning pay, allowances and bank accounts and missions and journeys will be kept for 10 years in order to comply with the audit/accounting obligations of the responsible data processors.
- Personal data collected for future mailing purposes linked to activities of Alumni Networks (via newsletters or invitations to similar events) will be kept until data subject unsubscribes from the mailing list.
- Personal data shared with the Directorate-General for Human Resources and Security of the European Commission for the participants to gain access to Commission buildings is kept for 6 months after the termination of the link between the data subject and the Commission (e.g.: for visitor: end of the visit plus 6 months).

Further details of processing and relevant data retention periods may be applicable, as each (type of) activity in support of the Alumni Networks may be different. Where this is the case, the details of processing and applicable retention will be described in the corresponding data protection notices for each specific Alumni Network or specific (category of a) activity.

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 access the personal data EACEA holds about you;
- Request a rectification of your personal data where necessary;
- Request the erasure of your personal data;
- Request the restriction of the processing of your personal data;
- Request to receive or to have your data transferred to another organization in commonly used machine readable standard format (data portability).

In addition, as this processing of your personal data is based on your consent [Article 5(1)(d) or Article 10(2)(a) of the data protection regulation], please note that you can withdraw it at any time, and this will have effect from the moment of your retraction. The processing based on your consent before its withdrawal will remain lawful.

Article 25 of Regulation (EU) 2018/1725 provides that, in matters relating to the operation of EU institutions and bodies, the latter can restrict certain rights of individuals in exceptional circumstances and with the safeguards laid down in that Regulation. Such restrictions are provided for in internal rules adopted by EACEA and published in the Official Journal of the European Union (<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32021Q0317%2801%29>).

Any such restriction will be limited in time, proportionate 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. You will receive a more specific data protection notice when this period has passed.

As a general rule you will be informed on the principal reasons for a restriction unless this information would cancel the effect of the restriction as such.

You have the right to make a complaint to the EDPS concerning the scope of the restriction.

7. Your right to have recourse in case of conflict on any personal data issue

In case of conflict on any personal data protection issue you can address yourself to the Controller at the above mentioned address and functional mailbox.

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 at any time: <http://www.edps.europa.eu>.

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

The following articles of the Regulation are giving the legal basis to this processing:

Article 5(1):

- (a) 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 (to be laid down in Union Law);
- (d) the data subject has given consent to the processing of his or her personal data for one or more specific purposes;
- (e) processing is necessary in order to protect the vital interests of the data subject or of another natural person.

Article 50 (1) (a) and (d): Explicit consent for international transfers & transfer is necessary for important reasons of public interest

Article 10 (2) (a) for the processing of special categories of data such as health data

The applicable legal basis are:

- i) 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;
- ii) Commission Implementing Decision (EU) 2021/173 of 12 February 2021 establishing the European Education and Culture Executive Agency;
- iii) 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;
- v) Commission Regulation (EU, Euratom) 2018/1046 of the European Parliament and of the Council of 18 July 2018 on the financial rules applicable to the general budget of the Union (hereafter the Financial Regulation);
- v) Regulation (EU) 2021/817 of the European Parliament and of the Council of 20 May 2021 establishing Erasmus+: the Union Programme for education and training, youth and sport and repealing Regulation (EU) No 1288/2013.