



EUROPEAN EDUCATION AND CULTURE
EXECUTIVE AGENCY (EACEA)

Erasmus Mundus Support Structure (EMSS)

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 Service contract for the Erasmus Mundus Support Structure (EMSS).

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 A3 |
Erasmus+, EU Solidarity Corps: Erasmus Mundus, Sport: Theo DUIVENVOORDE
Email: EACEA-A3-EM-SUPPORT-STRUCTURE@ec.europa.eu

2. Which personal data are processed?

The following personal data is processed:

- (mandatory) personal identification numbers (NID / Passport numbers to organise travel for invited speakers / event participants)
- (optional) physical characteristics of persons as well as the image and voice as part of event recordings
- (mandatory for invited speakers and participants) bank account to reimburse travel and accommodation costs
- (mandatory for invited speakers and participants) travel arrangements for conference speakers and participants
- (mandatory) telephone numbers and communications
- (mandatory) names and addresses (including email addresses)
- (optional) accessibility requirements for physical events; dietary requirements including food allergies for events catering.
- (optional) data submitted voluntarily during interviews/activities, on MS TEAMS and/or on the platform, by answering questions during interview or tick box agreeing data to be used in a publication, etc.

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.

3. For which purpose do we process your data?

The general objective of the Erasmus Mundus Support Structure is to provide Erasmus Mundus consortia with an environment for bottom-up exchange and networking, from the academic, pedagogical, scientific, and administrative points of view.

To achieve this objective, several networking/awareness raising/information events are organised throughout the contract. The purpose of the data processing for events management is to be able to register participants for these events and ensure that their needs are catered for at the event. The contract also includes the production of a study and a series of state of play reports, which require input from stakeholders via different means: workshops, surveys, and interviews.

List of activities throughout the contract that entail the processing of personal data as per tender specifications:

- Organisation of 3 Large Scale Conferences: these events will gather up to 250 participants.
- Organisation of 4 regional hybrid seminars (3 of them outside of the EU: Tokyo, Johannesburg (tbc) and Tbilisi (tbc): these events will gather up to 60 participants (in average, 30 presential, 30 online).
- Organisation of 4 EMJM hybrid kick off meetings: these events will gather up to 60 participants (30 presential, 30 online).
- Organisation of 4 worldwide webinars (info days): these events will gather up to 500 participants online.
- Erasmus Mundus Anniversary Conference: this event will gather up to 400 participants.
- Study on the impact of Erasmus Mundus: the study will be published. In order to gather data for the study, the following activities will be carried out: survey (no personal data collected), and expert workshops.
- Publication of 7 State of Play Reports in the Community of Practice platform: These reports include input gathered through interviews.
- Publication of 2 Study Visit Reports: These reports include input gathered through interviews.

Next to the reports and studies that are going to be made public, the contract foresees a series of deliverables requiring input from experts, in the form of interviews, surveys, written contributions or calls for expression of interest. For organisational purposes, data on contributors might be collected in internal working files stored in the servers of the Consortium partners (i.e. name, surname and email).. Interviews might be recorded upon consent of the data subject only for internal use (minutes taking, preparing publications).

Live web-streaming and audio-visual recording at the above-mentioned events of the speakers, organisers and participants, as well as photographs of the speakers and panoramic photographs of participants and organisers will be taken and published in the context of the above-mentioned events on the Community of Practice (<https://erasmus-networks.ec.europa.eu/erasmus-mundus>, under construction, thus URL subject to change) and the Agency / EC websites (https://www.eacea.ec.europa.eu/index_en) for communication purposes.

For physical events/activities, participants who do not wish to be part of the above web-streaming and recording/publishing activities will be offered the possibility to wear a badge with a specific colour strip and a lanyard of different colour. Alternatively (or additionally when possible), a space in the room may be dedicated for them to sit so they remain out of the camera focus.

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

Access to your personal data may be given on a need-to know basis to the following recipients:

- Authorised staff of EACEA and the European Commission, in particular the Directorate-General for Education, Youth, Sport and Culture (DG EAC), the Directorate-General for Informatics (DG DIGIT), and DG Interpretation of the European Commission (SCIC).
- Personal data collected during events organised with the technical support of DG Interpretation of the European Commission (SCIC) is processed and stored in line with the applicable data protection records No. DPR-EC-00306.1 <https://ec.europa.eu/dpo-register/detail/DPR-EC-00306.1> and No. DPR-EC-00297.5 <https://ec.europa.eu/dpo-register/detail/DPR-EC-00297>
- Authorised staff of the EMSS Consortium (data processors), which runs the EMSS contract on behalf of the European Education and Culture Executive Agency (EACEA): NTT DATA Belgique, TIPIK COMMUNICATION AGENCY SA, ASSOCIATION POUR LA COOPERATION ACADEMIQUE - ACADEMIC COOPERATION ASSOCIATION, DEUTSCHER AKADEMISCHER AUSTAUSCHDIENST EV, and the subcontractor NTT DATA Spain SLU.
- Registered members of the Community of Practice who have access to personal data available or shared on a voluntary basis in the Community of Practice channels
- Webex Conference Service (WebEx) and Ms Teams will process your data for the purpose of organising and managing events
- Personal data collected and processed via Webex is processed and stored in line with the applicable data protection record DPR-EC-05006.3 <https://ec.europa.eu/dpo-register/detail/DPR-EC-05006.3>
- Personal data collected on MS Teams is processed and stored in line with the applicable data protection record No. DPR-EC-04966.4 <https://ec.europa.eu/dpo-register/detail/DPR-EC-04966.4>
- Slido to interact with the audience during events – Personal data collected on Slido is processed and stored in line with the applicable data protection record No. DPR-EC-06687.1 <https://ec.europa.eu/dpo-register/detail/DPR-EC-06687>
- Doodle to consult availabilities might be used (collecting name) – Personal data collected and processed via Doodle is processed and stored in line with Doodle's privacy policy: <https://doodle.com/en/privacy-policy/>
- EUSurvey to register participants – Personal data collected on EU Survey is processed and stored in line with the applicable data protection record No. DPR-EC-01488 <https://ec.europa.eu/eusurvey/home/privacystatement>
- General public when events/outputs (recording, pictures, surveys, etc) are made public on EACEA/EC websites

Use of third-party tool: please note that several events will be organised using Webex Conference Service (WebEx) or Ms Teams which has a contract with the European Commission. Your personal data used for your participation to the event will also be processed by these tools, in accordance with its privacy policy.

Please note that in order to deliver the service, Webex Conference Service (WebEx) and Ms Teams might transfer your personal data outside the EU in accordance with their respective privacy policies (mentioned above). Such transfer will be made based on standard contractual clauses as part of a contract between the service provider and the European Commission. You can obtain more information on it by contacting the data controller at the above-mentioned email address.

Personal data made public by registered Community members in the Community of Practice channels can be seen by other users. Some of them could be based outside the EU or the European Economic Area. The general public will also have access to any workshop content/outputs (including images) published by EACEA and/or the European Commission via the Internet, including on the Community of Practice.

In addition, in case of control or dispute, 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
- EU courts and national authorities

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.

Personal data is stored for a maximum of 132 months / 11 years (48 months / 4 years duration of the contract + 60 months / 5 years up to notification of audit + 24 months / 2 years to cover audit period). Personal data will be only processed for a limited period and erased thereafter. Considering the contract duration, the processing period will be of 48 months. After that period personal data will be blocked and only kept for the purposes of providing evidence to eventual project audits or exercising legal claims, in line with the provisions of the service contract, which states that the contracting authority can notify the contractor of an audit up to five years after the end of the contract. An additional two years (24 months) have been added to cover the provision of evidence for such an audit should it be required.

Data concerning health (dietary restrictions) and disabilities collected for events is deleted one month after the event for which it was collected.

The recordings of the interviews and of the events is kept for the duration of the contract (48 months / 4 years).

The personal data of the users of the Erasmus Mundus Community of Practice <https://erasmus-networks.ec.europa.eu/erasmus-mundus> (under construction, thus URL subject to change) managed through Open Social is kept up to three years following the last login within the maximum duration of the contract (48 months). 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 and if users with a deactivated profile want to continue using the platform, they will need to register again.

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).

For the processing of your personal data which is based on public interest under Article 5(1)(a) of the data protection regulation, please note that you have the right to object to processing of your personal data on grounds relating to your particular situation under the provisions of Article 23 of the data protection regulation.

For the processing of your personal data which is based on your consent under Article 5(1)(d), Article 10(2)(a) or Article 50.1(a), 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 processing of your personal data is based on the following legal bases under of Regulation (EU) 2018/1725:

- **Art. 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):
 - For collecting and processing your data for the purpose of organising and managing the above-mentioned activities.
 - For processing of your personal data using the above-mentioned third-party tool used to organise event.
 - For audio and video recording of events

The applicable legal basis under Art. 5(1)(a) are:

- The “2022 annual work programme “Erasmus+”: the Union Programme for Education, Training, Youth and Sport”;
 - The Commission Implementing Decision 2021/173 establishing the European Education and Culture Executive Agency;
 - 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
 - The Commission Decision C(2021)951 and its annexes delegating powers to EACEA for the management of programmes in the MFF 2021-2027.
 - Service contract No. SI2.892435 ‘Erasmus Mundus Support Structure’
- **Art. 5(1)(d):** the data subject has given consent to the processing of his or her personal data for one or more specific purposes.

Your consent is required for:

- Inclusion of name and institution in participant list to be shared, via a tick box on the registration form
- Submitting data voluntarily during interviews, by sharing voluntarily during activities, on Ms Teams and/or on the platform, by answering questions during interview or tick box agreeing data to be used in a publication etc
- Being recorded during an online event, by activating camera/microphone.
If you do not want your personal data appearing into the audio and video recording and being published, you are requested to switch-off your camera and micro during the recording. You can also watch the recording of the event once available.
Moreover, for physical events/activities, the participants not wishing to be filmed or photographed will be offered the possibility to wear a badge with a specific colour strip and a lanyard of different colour. Alternatively (or additionally when possible), a space in the room may be dedicated for them to sit so they remain out of the camera focus.

- Article 10(2)(a): Explicit consent for processing of health-related data concerning participants to physical events (allergies, accessibility etc) by submitting voluntarily the data
- Art 50.1.(a): Explicit consent to international transfer :

To be collected in cases where data transfer occurs with countries outside EU/EEA and for which there is no adequacy decisions or that lack appropriate safeguards, when the contractor needs to take care of the following services: bookings of hotels, booking transfers to locations onsite, communication with local official authorities managing official buildings access, i.e. in cases where the participants will choose not to do the bookings by themselves.

For the organisation of certain events taking place on site in countries outside the EU-EEA area or in third countries other than those covered by an adequacy decision, the registration of participants as well as the booking of travels and accommodations of participants can be made either by the participants directly or by the contractor, which will require the collection and transfer of personal data into these third countries. Such registration or booking and subsequent transfers of personal data will be made upon the explicit consent of the data subjects (Art 50.1(a)).

For these countries, the EU has not adopted an adequacy decision pursuant to Article 47 of Regulation (EU) 2018/1725, hence certifying that the personal data once transferred, will benefit from an adequate level of protection in the third country of destination. Therefore, the level of protection of the personal data transferred will depend on the law or practice of that third country and, as a result, the rights as regards data protection might not be equivalent to those in and EU/EEA country or a country with an adequacy decision.