

## **Processing and protection of personal data within the framework of the Erasmus+ Programmes for the Decentralised Actions managed by the National Agencies and the European Solidarity Corps**

**Data controller:** Directorate-General for Education, Youth, Sport and Culture, Unit B.4 - Erasmus+ Coordination

### **Other specific privacy notices or data processing registrations**

- [EU Login](#)
- [Project Results Platform](#)
- [On-line language support](#)
- [European Youth Portal](#)
- [Incident Management Tool](#)
- [School Education Gateway](#)

### **Introduction**

The European Commission (hereafter 'the Commission') **is committed to protecting your personal data and respecting your privacy**. The Commission collects and further processes personal data according to [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 (repealing Regulation (EC) No 45/2001).

**This privacy statement explains the reasons for processing your personal data**, how we collect, handle, and ensure the protection of all personal data provided, how that information is used and what rights you have concerning your personal data. It also specifies the responsible Data Controller's contact details with whom you may exercise your rights, the Data Protection Officer, and the European Data Protection Supervisor's contact details.

### **Why and how do we process your personal data?**

We process your personal information for the following reasons:

#### **Authentication and authorisation**

- provide access to IT tools with authentication mechanism EU Login; please check the [specific privacy statement for EU Login](#) for more details
- manage access to IT tools with the authorisation mechanisms offered by EU Access and Secunda+
- manage access to programme reporting tools for National Agency staff and National Authority representatives

#### **Organisation registration**

- allow organisations to register so they may participate in the Erasmus+ and European Solidarity Corps actions managed by National Agencies
- identify applicant organisations requesting an EU grant for a project under Erasmus+ and the European Solidarity Corps actions managed by National Agencies

## **Submission of application and management of grant applications and projects**

- facilitate the submission of applications for the different Erasmus+ and European Solidarity Corps actions managed by the National Agencies
- manage the selection procedures under Erasmus+ and European Solidarity Corps actions managed by National Agencies
- management of a pool of experts assessing grant applications
- fulfil the obligations and responsibilities relating to monitoring, evaluation, reporting and auditing
- assess the impact of Erasmus+ and European Solidarity Corps programme participation on beneficiary organisations and acquire a better knowledge of participating groups to fine-tune outreach strategies
- disseminate the project results together with personal data of contact persons through the appropriate Erasmus+ and European Solidarity Corps IT tools (Project Results Platform); consent will be requested from the contact persons before publishing their contact data (see [Project Results Platform specific privacy statement](#) for more information)
- transfer data to enable the management of language training licences for individual mobility participants (see [Online Linguistic Support \(OLS\) privacy policy](#) for more information)
- transfer data on the accreditation and quality Label of the European Solidarity Corps to the European Youth Portal; unequivocal consent will be requested from the contact persons before publishing their contact data (see [European Youth Portal specific privacy statement](#) for more information)
- manage the details of projects funded by its Erasmus+ and European Solidarity Corps programmes (such as mobility projects, cooperation projects, policy support actions), including the achievement of project objectives, the number and type of participants, and budgetary and financial aspects

## **Management of Erasmus+ and European Solidarity Corps participants' data**

- manage participating organisations in the project to ensure monitoring and follow-up;
- provide reporting and accountability via statistics collected from the project and the answers provided by the beneficiary or participants
- manage the individual participant surveys and provide statistics on the answers provided, which is essential to demonstrate how the project funds have been used and how the programme objectives have been achieved
- provide support to future participants in the programmes (based on consent, i.e., on a voluntary 'opt-in' basis)
- provide testimonials on participation in the programmes to the general public (based on consent, i.e., on a voluntary 'opt-in' basis)

## **Other processing activities**

- manage access to work programmes, contribution agreements and annual reports for National Agencies
- facilitate participation in further studies regarding the programmes and EU issues (based on consent, i.e., on a voluntary 'opt-in' basis)
- allow the Erasmus+ Student and Alumni networks or the contractor supporting their activities to contact Erasmus+ participants to take part in their activities (based on consent, i.e., on a voluntary 'opt-in' basis)
- provide feedback to participants on courses taken (based on consent)

- manage help desk activities, where your personal data is to be used to describe a problem with a computer system (see [incident management system data processing records](#) for more information)

### **We will not use your personal data for automated decision-making, including profiling.**

Your personal data is introduced directly by you or your organisation (e.g., the sending institution) in an IT tool to which access is given to different processors, as described later in this document. The access by another entity, such as the National Agency or receiving institution, to this data to ensure data quality and consistency is considered a 'data transfer'. The types of transfers are described in other sections.

### **On what legal grounds do we process 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
- processing is necessary for the performance of a contract to which the data subject is party or to take steps at the request of the data subject before entering into a contract (participants' agreement, grant agreement signed by your organisation with a National Agency)
- processing is necessary for compliance with a legal obligation to which the controller is subject according to the relevant programme legal bases:
  - [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;
  - [Regulation \(EU\) 2021/888](#) of the European Parliament and of the Council of 20 May 2021 establishing the European Solidarity Corps Programme and repealing Regulations (EU) 2018/1475 and (EU) No 375/2014.

### **What personal data do we collect and further process?**

Personal data collected about a **registered organisation's contact person** and authorised users, as well as personal data collected about the legal representative and the contact persons of the organisations applying for funding or taking part in a project:

- EU Login account ID
- Gender
- first name
- last name
- Department
- position in the organisation
- professional email
- main phone
- street name and number

The provision of this personal data is mandatory to register your organisation and process requests for funding.

**Personal data of National Agency staff** accessing IT tools for Erasmus+/European Solidarity Corps programme management:

- EU Login account ID
- title
- first name
- last name
- Gender
- Department
- position
- phone number
- email address

The provision of this personal data is required for the management of grant applications by National Agencies.

**Personal data of National Authorities' staff:**

- EU Login account ID
- title
- first name
- last name
- Department
- position
- phone number
- email address

This personal data is required to monitor the programme's implementation and audit of National Agencies.

**Personal data of experts:**

- EU Login account ID
- title
- first name
- last name
- email address
- phone number

The provision of this personal data is required for the assessment of grant applications.

**Personal data of participants in Erasmus+ activities or the European Solidarity Corps project:**

- participant ID
- participant registration number (if already registered in the European Solidarity Corps portal)
- title
- first name
- last name

- date of birth (for learners)
- Gender
- nationality
- fewer opportunities/inclusion support (yes/no) - this is collected when it could have an impact on the additional amounts received as part of the grant and for statistics

We process the information required to evidence barriers faced by people with fewer opportunities, Such processing is necessary for a substantial public interest, based on Union law, which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide suitable and specific measures to safeguard the fundamental rights and the interests of the data subject. This is collected only when it could have an impact on the arrangements that are necessary to enable the applicant to take part in the project or the additional amounts received as part of the grant and for statistics

The provision of these personal data is mandatory for the management of projects and associated activities/mobilities.

#### **Personnel Data of the Erasmus+ National Offices:**

- EU Access Account ID
- title
- first name
- surname
- email address

#### **How long do we keep your personal data?**

DG EAC only keeps your personal data for the time necessary to fulfil the purpose of collection or further processing.

- For the **EU Login** retention policy, please check the [EU Login privacy statement](#)
- **Organisation registration:** personal data linked to organisations participating in projects will be deleted ten years after the end of the year of the closure of the last project in the relevant programme (defined by the last financial transaction between NA and the beneficiary organisation) unless the organisation is participating in another programme. In addition, every three years, data of organisations that have neither applied for funding nor participated in a project in that period will be deleted.
- **Submission of application forms:** personal data will be deleted five years after the submission deadline of the relevant call for proposals
- **Management of applications and projects:** personal data will be anonymised ten years after the end of the year of the closure of the last project in the relevant programme (defined by the last financial transaction between NA and the beneficiary organisation)
- **Management of mobilities:** DG EAC processes your personal data for the duration of your grant project, which can be up to 36 months maximum. After that, DG EAC must retain your personal data as long as it is required by EU law for audit purposes because checks or fraud investigations are routinely carried out after the completion of actions, and the data must be available so that we can rule out issues such as fake participation and double funding. Ultimately, we will delete data a maximum of ten years after the end of the year of closure of the agreement between the National Agency and the Commission from which the project in which you participated was funded.

- For the **dissemination platform**, please check the [Project Results Platform specific privacy statement](#)
- For **help desk systems**, check the [data processing record of the incident management system](#)

The obligation to evaluate the impact of the programmes, as provided in the regulations establishing Erasmus+ and the European Solidarity Corps, does not require personal data to be maintained.

## **How do we protect and safeguard your personal data?**

The European Commission stores all data in a datacentre located inside the EU. National Agencies will process personal data in internal IT systems of the National Agencies. This is considered a 'data transfer'. The types of transfers are described in the next section of this document.

All processing operations by the Commission are carried out according to the Commission Decision (EU, Euratom) 2017/46 of 10 January 2017 on the security of communication and information systems in the European Commission.

A specific contractual clause binds the Commission's contractors 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](#)).

The Commission has put several technical and organisational measures in place to protect 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 personal data solely to authorised persons with a legitimate need to know for this processing operation.

National Agencies and all other processors are required to adopt appropriate technical and organisational security measures regarding protecting personal data.

## **Who has access to your personal data, and to whom is it disclosed?**

The transfer of your personal data is necessary for the conclusion or performance of an agreement concluded in your interest between the controller (European Commission) and another natural or legal person (National Agencies in the EU Member States, EEA countries, as well as programme countries Turkey, Serbia, and North Macedonia). The transfer is done by providing access to your personal data to different organisations, as described below.

Who has access to your personal data and to whom it is disclosed depends on where your personal data are transferred. There are currently two types of data transfers, which ensure different levels of protection:

- Data transfers to the European Union Member States, to countries of the European Economic Area, or to countries for which the Commission adopted an [adequacy decision](#) ensuring an adequate level of protection.

- Data transfers to third countries for which there is no Commission adequacy decision and the level of protection of your rights concerning your personal data might not be equivalent to the EU legislation.

### **In case of transfers of personal data inside EU/EEA and to countries with an adequacy decision:**

Access to your personal data is provided to the European Commission staff responsible for carrying out this processing operation and authorised staff according to the "need to know" principle. Such staff abide by statutory and, when required, additional confidentiality agreements.

Outside the European Commission, access to your personal data is provided to the following categories of processors

### **Organisations in Erasmus+ or European Solidarity Corps projects:**

- Authorised staff of beneficiary organisations managing the grant project, mobilities and other project activities such as cooperation projects
- Authorised staff of project partner organisations

### **Alumni organisations:**

- Relevant volunteers from organisations that are part of the [Erasmus+ Student and Alumni Alliance](#) (ESAA), and staff from the consortium appointed by the European Commission to support ESAA

### **Support and programme services:**

- the internal staff of the National Agencies in charge of the management of Erasmus+ and the European Solidarity Corps
- Authorised users in external companies contracted by the European Commission or by the National Agencies for the delivery of services, for example, development and support of IT tools
- Authorised staff of the European Education and Culture Executive Agency maintaining the School Education Gateway course catalogue service (more information in [School Education Gateway privacy statement](#))
- The appointed insurance company, which needs to know the people it has to cover as part of its contract for the European Solidarity Corps
- Language support online external contractor

### **Audit, monitoring and evaluating the programme:**

- When an audit or investigation takes place, external auditors may need access to your data to ensure the legality and regularity of the project implementation
- The staff of the Finnish National Agency for Education - EDUFI, Internationalisation Services for Youth, Culture, Sport, where is acting in their role as coordinator of the [Research-based Analysis of Erasmus+ Youth in Action \(RAY\) Network](#)

### **Other:**

- EU Delegation in the participant's sending countries

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

### **In case of transfers of personal data to third countries:**

Your personal data is transferred to a third country outside EU/EEA for which there is no adequacy decision (including to programme countries - Turkey, Serbia, and North Macedonia) if you are in one of the following situations:

#### **If you represent an applicant, beneficiary, or partner organisation:**

- you are the contact person or authorised user of a registered organisation or the contact person or legal representative of an organisation which applies or participates in a project managed by the National Agencies from Turkey, Serbia, and North Macedonia;
- you are the contact person or legal representative of an organisation which wrongly applied to a National Agency in EU/EEA Member States while the applicant should have submitted it to the National Agency in Turkey, Serbia, and North Macedonia; in this case, the application (including your personal data) is redirected towards these National Agencies;
- you are the contact person or legal representative of an organisation from Turkey, Serbia, or North Macedonia that applies or participates in a KA2 project managed by a National Agency in EU/EEA;
- you are the contact person or the legal representative of an applicant organisation which provided access to the application to an authorised person from a third country

#### **If you are the participant:**

- you carry out mobility to the third country
- you participate in a project with a partner organisation from a third country
- you participate in a project managed by the National Agencies in Turkey, Serbia, or North Macedonia
- you participate in a project with a beneficiary organisation or coordinator (for schools-to-schools projects only) from Turkey, Serbia, or North Macedonia

Access to your personal data is provided to the following organisations from the third country:

- Authorised staff of the National Agencies from Turkey, Serbia, and North Macedonia if you are:
  - the contact person or authorised user of a registered organisation or the contact person or legal representative of an organisation which applies or participates in a project managed by those National Agencies
  - the contact person or legal representative of an organisation which wrongly applied to a National Agency in Turkey, Serbia, or North Macedonia, while the applicant should have submitted it to the National Agency in EU/EEA Member States
  - the contact person or legal representative of an organisation from Turkey, Serbia, or North Macedonia which applies or participates in a KA2 project managed by a National Agency in EU/EEA
  - participating in a project managed by the National Agencies from these countries



- a National Agency staff member;
- An authorised person from a third country organisation, if:
  - you are the contact person or the legal representative of an applicant organisation which provided access to the application to an authorised person from a third country
  - a beneficiary organisation in your project has provided access to your personal data
- The staff of beneficiary organisations from Turkey, Serbia, or North Macedonia manage the grant project, mobilities and other project activities such as cooperation projects (if you participate in a project with a beneficiary organisation or coordinator from these countries)
- Authorised staff of project partner organisations from a third country (if you participate in a project with a partner organisation from a third country) (recipient)

Authorised staff of Erasmus+ National Offices in the receiving third country (for statistical purposes, if mobility to a third country)

In this case, the level of protection of your personal data will depend on the law or practice of that third country. However, your rights as regards data protection might not be equivalent to those in an EU/EEA country or a country with an adequacy decision.

Suppose you are an Erasmus+ or European Solidarity Corps participant, and your sending institution is located in an EU/EEA country. In that case, the transfer must comply with the conditions laid down in Chapter V of Regulation (EU) 2018/1725.

Please note that according to Article 3(13) of Regulation (EU) 2018/1725, public authorities (e.g., Court of Auditors, EU Court of Justice) may receive personal data in the framework of a particular inquiry following Union or Member State law shall not be regarded as recipients. The further processing of those data by those public authorities shall follow the applicable data protection rules according to the purposes of the processing

The information we collect will not be given to any other party in a third country outside the EU/EEA, except to the extent and purpose the national law may require of the country in question.

### **What are your rights, and how can you exercise them?**

You have specific rights as a 'data subject' under Chapter III (Articles 14-25) of Regulation (EU) 2018/1725, in particular, the right to access your personal data and to rectify them in case your personal data are inaccurate or incomplete. Where applicable, you have the right to erase your personal data, restrict the processing your personal data, and object to the processing.

You have the right to object to processing your personal data, which is lawfully carried out pursuant to Article 5(1)(a) on grounds relating to your particular situation.

You can exercise your rights by contacting the Data Controller or, in case of conflict, the Data Protection Officer of the European Commission. If necessary, you can also address the European Data Protection Supervisor. We provide their contact information in the section below.

Where you wish to exercise your rights in the context of one or several specific processing operations, please provide their description (i.e., their Record reference(s) as specified under the section below) in your request.

## **Contact information**

### **The Data Controller**

Directorate-general for Education, Youth, Sport and Culture, Unit B.4 - Erasmus+ Coordination

If you would like to exercise your rights under Regulation (EU) 2018/1725 or if you have comments, questions or concerns related to the processing of your personal data, or if you would like to submit a complaint regarding the collection and use of your personal data, please send an email to the Data Controller at [eu-erasmus-esc-personal-data@ec.europa.eu](mailto:eu-erasmus-esc-personal-data@ec.europa.eu).

Further to the above, you can contact:

### **The Data Protection Officer (DPO) of the European Commission**

You may contact the Data Protection Officer at [data-protection-officer@ec.europa.eu](mailto:data-protection-officer@ec.europa.eu) concerning issues related to processing your personal data under Regulation (EU) 2018/1725.

### **The European Data Protection Supervisor (EDPS)**

You have the right to have recourse (i.e., you can complain) to the European Data Protection Supervisor if you consider that your rights under Regulation (EU) 2018/1725 have been infringed because of the processing of your personal data by the Data Controller.

### **Where to find more information?**

The Commission Data Protection Officer (DPO) publishes the register of all processing operations on personal data by the Commission, which have been documented and notified to him. You may access this information via the [Register of the Data Protection Officer](#).

This specific processing will be included in the public register of the DPO, which will be the subject of the final adoption of the above-mentioned regulations by the European Parliament and the Council without substantial changes to the political agreement reached in December 2020 between the co-legislators.

You can find more information about processing personal data in Erasmus+ and European Solidarity Corps on the [Erasmus+ and data protection page](#).

Source: <https://webgate.ec.europa.eu/erasmus-esc/index/privacy-statement>