



Education, Audiovisual and Culture Executive Agency

ERASMUS + Virtual Exchange Privacy Statement

The European Commission, Directorate-General for Education, Youth, Sport and Culture ("DG EAC") and the Education, Audiovisual and Culture Executive Agency ("EACEA") are committed to preserving your privacy. All personal data are dealt with in accordance with the applicable EU data protection legislation, currently Regulation (EC) No 45/2001 on the protection of personal data by the Community institutions and bodies¹.

The following Privacy Statement outlines the policies by which DG EAC and EACEA collect, manage and use the personal data of the concerned individuals within the Erasmus+ Virtual Exchange Project. We value your trust and want to make sure that you understand our policies and practices regarding the protection of your data within the Erasmus+ Virtual Exchange Project. Therefore, we encourage you to read this privacy statement.

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

The European Commission represented by the Directorate-General for Education, Youth, Sport and Culture on the one hand, and the Education, Audiovisual and Culture Executive Agency on the other hand, are joint controllers.

Person designated as being in charge of the processing operation: Head of Unit A5 of EACEA
Postal address: Education Audiovisual and Culture Executive Agency, Avenue du Bourget 1, (J-59 08/33), BE-1049 Brussels
Email: eacea-eplus-eve@ec.europa.eu

2. Which personal data are processed and how?

The following personal data are processed in the context of the ERASMUS+ Virtual Exchange project. This list is exhaustive.

Personal data of those asking queries or expressing interest in the project

- Through queries or expressions of interest via the Erasmus+ Virtual Exchange Hub, on the European Youth Portal, the following personal data are collected:
 - Name, e-mail address, occupation (student, youth worker, academic worker, young person not in higher education, facilitation trainee, contact point persons at partner institutions), city/country, interest/motivation in the activity;

¹ Regulation (EC) No 45/2001 of the European Parliament and of the Council of 18 December 2000 on the protection of individuals with regard to the processing of personal data by the Community institutions and bodies and on the free movement of such data, OJ L8 of 12.1.2001, p. 1.

- If desired, you can also provide us with your telephone number and the name of your organisation.

Personal data of participants

- Through registration to the activities and onto the relevant exchange platforms, the controllers collect the following personal data:
 - Name, e-mail address, telephone number, country of residence, nationality, gender, date of birth, occupation (student, youth worker, academic worker, young person not in higher education, facilitation trainee, contact point persons at partner institutions), name of organisation/institution, region of origin (South Mediterranean or Europe), access speed of the internet connection, schedule availability for the duration of the programme, experience with or interest in virtual exchange, for youth workers/higher education staff participating in training: experience with or interest in Transnational Erasmus+ Virtual Exchange Projects (TEPs).
 - If desired, you can also provide us with the following information: alternate e-mail address, skype account, mother tongue(s), additional languages spoken, if applicable graduation year and field of study.
- When using the platforms, you can choose to upload your picture for your profile.
- Participants may be required to do technical diagnostic test that automatically collects essential cookies and as such IP address and browser version.
- Political opinions, religious or philosophical beliefs can be exchanged voluntarily by participants in chats, forums, video or written assignments and under their own responsibility.
- As part of some project activities, videos and photos may be produced/taken by the participants themselves. Videos and photos are collected/used as part of the learning activity.
- Factual information on attendance to synchronous sessions and completion of assignment(s).
- For Monitoring & Evaluation purposes, data relating to users' experience, skill acquisition and behaviour changes is collected through mini web surveys, pre- and post-activity questionnaires, as well as interviews and focus groups. This data collection is conducted on a voluntary basis. Data collected is anonymized and is only used for the purpose of research and evaluation about the project.

Personal data of facilitation trainees/facilitators

- Through application and registration to the training activities and onto the exchange platforms, the controllers collect the following personal data on facilitation trainees/facilitators:
 - Name, email address, phone number, date of birth, gender, nationality, region of origin, schedule availability for program durations, current residence, country of origin, mother tongue(s), CV, cover letters, skype account.
 - If desired, the following information can also be provided: alternate email, additional languages spoken, education, areas of expertise.
- Facilitators can choose to upload their picture for their profile on the exchange platform.
- Facilitation trainees/facilitators need to do a technical diagnostic test that automatically collects essential cookies and as such the following data: IP address and browser version
- Confirmed Erasmus+ Virtual Exchange facilitators can choose to upload their picture and a short biography about themselves for the Erasmus+ Virtual Exchange Hub.
- Data reflecting the performance of trainees and facilitators in the activities is also collected during the programmes. This evaluation includes data on trainees' alignment with Virtual Exchange principles, overall performance and use of facilitation tools.
- For Monitoring and Evaluation purposes, facilitation trainees and confirmed facilitators are further asked to complete regular evaluations and questionnaires relating to their training/facilitation experience, support and learning they receive from trainers and staff. Trainees are specifically asked about learning and skills gained through training. Interviews and focus groups are also conducted with some facilitators. The data collection is conducted on a voluntary basis. Data collected is anonymized and is only used for the purpose of research and evaluation about the project.

3. For which purpose do we process your data?

We process your personal data for:

- The Erasmus+ Virtual Exchange project setup;
- Registration of participation in the project activities;
- Implementation;
- Quality control;
- Monitoring and evaluation;
- Outreach and communication purposes within the framework of the Erasmus+ Virtual Exchange project;
- Dissemination of information about the initiative;
- Solicitations of participation;
- Establishing partnerships with and among higher education institutions and youth organisations;
- The purpose of awarding Erasmus+ Virtual Exchange badges to participants in the project, as recognition of participation in the learning activity, based on clear and transparent criteria;
- The purpose of providing feedback to partner institutions (higher education institution or youth organisation) on the attendance and completion of assignments of participants enrolled in the project activities via these institutions;
- The purpose of complying with all legal or regulatory provisions to which DG EAC and EACEA are subject.

4. On which legal basis do we process your personal data?

The main legal bases for the processing of personal data are:

- 'Erasmus+': the Union programme for education, training, youth and sport established by Regulation (EU) No 1288/2013 of the European Parliament and of the Council of 11 December 2013 and repealing Decisions No 1719/2006/EC, No 1720/2006/EC and No 1298/2008/EC (OJ L 347 of 20.12.2013, p. 50–73);
- Commission Implementing Decision of 18 December 2013 establishing the 'Education, Audiovisual and Culture Executive Agency' and repealing Decision 2009/336/EC (2013/776/EU): Article 3(a).

5. How long do we keep your personal data?

The controllers will not retain your personal data for longer than necessary to fulfil the purposes outlined in this privacy statement.

Personal data of those asking queries will be kept only as long as necessary to respond to the query and/or expression of interest. They will be deleted after the processing, and, at the latest, one year after reception of the query/expression of interest. Where a mailing list has been signed up to, the user will be able to unsubscribe from that list at any time and the personal data will be kept until that time.

Personal data contained within participants' and facilitators' user accounts on the virtual exchange platforms will become inactive 2 year after the user's last log-in and will immediately be anonymised. Chats that take place during the live sessions are deleted at the end of each session. Posts and contributions on forums, as well as videos exchanged on the platforms during the project will be deleted one year after the end of each project activity. All data collected regarding the participants' attendance and completion of assignments will be anonymised one year after the end of each project activity, after the Erasmus+ Virtual Exchange recognition badges have been awarded.

Minimised data about youth participants (name, e-mail) will be kept, based on consent (opt-in), to ensure the continued engagement with alumni, propose participation in future programmes and trainings, and keep alumni informed about the project.

All data collected for the monitoring and evaluation of the activities, including the surveys, questionnaires and interviews, are anonymised prior to any processing for analysis.

Personal data of facilitators and trainers will be deleted two years after they cease being active in the Erasmus+ Virtual Exchange project. Their photo and short biography will cease being public/visible on the Hub. Minimised data about facilitators and trainers (name, email, gender, nationality, country of residence, languages spoken, as well as past performance data) will be retained, on the basis of consent (opt-in), for the continuity of the project and in order to solicit participation in future programmes.

Participants and facilitators can delete their profiles themselves at any moment.

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

As a participant or a facilitator, your basic data, user-generated content, contributions and comments posted onto the platforms will be visible to the other users of the exchange platforms.

The photos and biographies of Erasmus+ Virtual Exchange Facilitators, who have provided their consent to post this information on the Erasmus+ Virtual Exchange Hub, will be visible for the general public.

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

- EACEA and DG EAC designated staff.
- Authorised staff of the consortium of organisations contracted by the EACEA to implement the project activities, i.e. Search for Common Ground, Anna Lindh Euro-Mediterranean Foundation for Dialogue between Cultures, Unione delle Università del Mediterraneo (UNIMED) and Stichting Sharing Perspectives (SPF), and their subcontractors, including Soliya, UNICollaboration, Zentrum für Angewandte Kulturwissenschaft und Studium Generale (ZAK), and Consult and Design.

In addition, transfers of personal data to the following third parties and countries can take place in the context of the Erasmus+ Virtual Exchange project, on a need-to-know basis. Such transfers are done with appropriate safeguards, referenced below. You may request to obtain a copy of them by contacting the controllers as indicated under 1 above.

- Authorised Soliya staff, based in the US. Soliya is certified under the EU-US Privacy Shield. Confidentiality is further ensured through a non-disclosure agreement;
- Authorised Soliya staff of the Tunisia branch. Confidentiality is ensured through a Commitment on the Processing of Personal Data for the Project Erasmus+ Virtual Exchange;
- Facilitators/trainers, located anywhere in the world. Confidentiality is ensured through a non-disclosure agreement;

- Partner institutions, located in any eligible country, who only receive data in relation to the students/members coming from their own institutions. Confidentiality is ensured through a data protection clause in the Memorandum of Understanding signed between the consortium and these institutions;
- Processors engaged by the consortium, including the following cloud storage providers: GSuite, SurveyMonkey, Nomadesk, Mailchimp, Live Agent, Drupal, Amazon. For those based in the US (such as GSuite, Mailchimp and Amazon), they are all certified under the EU-US Privacy Shield.

7. How do we protect your personal data?

The controllers and its contractors ensure an appropriate level of security for the protection of your personal data through the adoption of technical and organizational measures, such as for example data access management and encryption.

8. How can you exercise your rights , such as the right of access and rectification of data concerning you?

You have the right to:

- Request to access the personal data we have on you;
- Request a rectification of your personal data;
- Request the erasure of your personal data;
- Request the restriction of the processing of your personal data;
- Object to the processing of your personal data;
- Request for your data to be transferred to another organization in commonly used machine-readable standard format (data portability);
- Withdraw your consent at any time.

To exercise your rights, please contact the controllers as indicated under 1 above by explicitly specifying your request.

9. 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 controllers at the above mentioned address and functional mailbox.

You can also contact EACEA's Data Protection Officer 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: Website <http://www.edps.europa.eu>.