



| <b>Controller's Record of Personal Data Processing Activity</b> |   |   |
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| <b>Item No.</b>   |   |   |
| 1.  | Name, department and e-mail address of Delegated Controller (author)  | Hilde Christiaensen, <a href="mailto:hilde.christiaensen@eursc.eu">hilde.christiaensen@eursc.eu</a><br>Ana Paula Costa, <a href="mailto:ana-paula.costa@eursc.eu">ana-paula.costa@eursc.eu</a>  |
| 2.  | Name, department and e-mail address of Joint Controller (if any) - attach arrangement between Joint Controllers |   |
| <b>I. Processing Activity</b>                                   |   |   |
| 3.  | Name of processing  | Organisation of school trips  |
| 4.  | Description and purpose of processing   | <p>EEB2 organises school trips for pupils, both within and outside the EU, on several occasions during the school year.</p> <p><b>Primary school:</b> A plan for all school trips is prepared at the beginning of the school year. School trips are organised through a sharepoint application designed for this purpose. The Deputy Director for the primary school must approve all trips involving primary school pupils in the sharepoint application. The Coordinator of primary school trips makes all reservations.</p> <p>An electronic form with medical/dietary information for pupils with special requirements ("fiche medical" is complete by the pupils' legal representative and added to the sharepoint application, and may be accessed by the Coordinator remotely while on the trip. If any of the pupils has a complex medical or dietary need, the Coordinator will meet with the pupil's legal representative and a school nurse before the trip to clarify the needs, and to determine whether a nurse should accompany the group on the school trip.</p> <p>The coordinator provides a list of names and dates of birth of pupils to the travel agent who makes the arrangements for the trip. The coordinator also provides a list of names of pupils with allergies, and the type of allergy and contact information of the pupil's legal representative, to the hotel where the group is staying.</p> <p><b>Secondary school:</b> Teachers wishing to organise a school trip complete several forms (Request for outing, Teacher's declaration, Risk assessment) and submit them to the Coordinator of secondary school trips. An authorisation form must be completed by each pupil's legal representative, giving consent for the pupil to participate in the outing, declaring that the legal representative has read the school outings regulations and agreeing to pay the costs of the trip. For trips lasting more than one day, two additional</p> |

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|                        |  | <p>documents must be completed and returned to the Coordinator: (1) the pupil must complete the pupil's declaration, stating that the pupil's legal representatives are aware of and have approved the pupil's choices and indicating that the pupil accepts the conditions and rules laid down by the school, and (2) the pupil's legal representative must complete the Emergency contact student information sheet, which asks for contact information of the emergency contact and the pupil's legal representative, as well as the pupil's passport information, GSM number, medical information and dietary requirements (in the alternative, a new electronic form may be completed with the required emergency contact information).</p> <p>The forms are provided to the teachers accompanying the pupils on the school trip, who keep it until the end of the trip. The teachers provide some information about the pupils (names, allergies, dietary requirements) to the hotel where the group is staying, in order to ensure that dietary requirements are followed.</p> <p>At the conclusion of the trip, the teacher who holds the documents is required to destroy them.</p> |
| 5.                     | Name and e-mail address of processor (sub-contractor)                          | [Need name of travel agent]  |
| 6.                     | Does the processing operation involve any automated decision-making/profiling? | <input type="checkbox"/> Automated<br><input checked="" type="checkbox"/> Manual (not automated)   |
| 7.                     | Storage media  | <input checked="" type="checkbox"/> Paper<br><input checked="" type="checkbox"/> Electronic  |
| 8.                     | Retention period   | <p><i>Please suggest what you believe would be a reasonable retention period based on need and any applicable EU or Belgian legal obligations of which you are aware:</i></p> <input type="checkbox"/> ___ days<br><input type="checkbox"/> ___ weeks<br><input type="checkbox"/> ___ months<br><input type="checkbox"/> ___ years<br><input checked="" type="checkbox"/> other (explain) School year + 1  |
| <b>II. Legal basis</b> |  |  |
| 9.                     | Legal basis of processing  | <input checked="" type="checkbox"/> Data subject's consent (attach blank consent form)(GDPR Art. 6(1)(a))<br><input type="checkbox"/> Necessary for performance of contract (GDPR Art. 6(1)(b))<br><input checked="" type="checkbox"/> Necessary for compliance with legal obligation (GDPR Art. 6(1)(c)) – concerning trips to Switzerland<br><input checked="" type="checkbox"/> Necessary to protect data subject's vital interests (GDPR Art. 6(1)(d))<br><input checked="" type="checkbox"/> Necessary for performance of task carried out in the public interest or in controller's official authority (GDPR Art. 6(1)(e))<br><input type="checkbox"/> Necessary for legitimate interests of controller or 3 <sup>rd</sup> party (GDPR Art. 6(1)(f))   |
| <b>III. Data</b>       |  |  |
| 10.                    | Categories of data subjects  | <input checked="" type="checkbox"/> Pupils <= 16 yrs old<br><input checked="" type="checkbox"/> Pupils > 16 yrs old<br><input checked="" type="checkbox"/> Parents<br><input type="checkbox"/> PAS<br><input type="checkbox"/> Seconded staff (excluding teachers)<br><input type="checkbox"/> Seconded staff (teachers)<br><input type="checkbox"/> Locally recruited staff<br><input type="checkbox"/> Interim staff   |

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|     |  | <input type="checkbox"/> (Successful) candidates (to a vacancy)<br><input type="checkbox"/> Unsuccessful candidates (to a vacancy)<br><input type="checkbox"/> Trainees<br><input type="checkbox"/> Vendors<br><input type="checkbox"/> Other (specify)  |
| 11. | Categories of personal data collected        | <input checked="" type="checkbox"/> Name<br><input checked="" type="checkbox"/> Surname<br><input checked="" type="checkbox"/> Date of birth<br><input type="checkbox"/> City of birth<br><input type="checkbox"/> Country of birth<br><input checked="" type="checkbox"/> Nationality<br><input type="checkbox"/> Gender<br><input type="checkbox"/> Data concerning siblings<br><input type="checkbox"/> School email address<br><input type="checkbox"/> Personal email address<br><input checked="" type="checkbox"/> Professional email address<br><input checked="" type="checkbox"/> Professional phone number<br><input checked="" type="checkbox"/> Personal phone number<br><input checked="" type="checkbox"/> Home address<br><input type="checkbox"/> Picture<br><input type="checkbox"/> Student ID number<br><input type="checkbox"/> Parental marital status<br><input type="checkbox"/> Name of legal guardian (main custody of the child)<br><input type="checkbox"/> Salary or economic information<br><input type="checkbox"/> Other (health data concerning allergies and illnesses which may be needed in case of emergency)   |
| 12. | Documents collected containing personal data | <input checked="" type="checkbox"/> Copy of passport<br><input checked="" type="checkbox"/> Copy of ID<br><input type="checkbox"/> Copy of transport document<br><input type="checkbox"/> Birth certificate<br><input type="checkbox"/> Marriage certificate<br><input type="checkbox"/> Document proving the exercise of parental authority<br><input type="checkbox"/> CV<br><input type="checkbox"/> Motivation letter<br><input type="checkbox"/> Application email of the candidate<br><input type="checkbox"/> Correspondence with the candidate<br><input type="checkbox"/> Declaration concerning the relevant professional experience<br><input type="checkbox"/> Declaration concerning allowances<br><input type="checkbox"/> Copy of relevant diploma<br><input type="checkbox"/> Reference letter<br><input type="checkbox"/> Work contract<br><input type="checkbox"/> Evaluation sheets   |
| 13. | Special categories of data                   | <p><i>Please specify type and justification for processing:</i></p> <p>1. Type:</p> <input checked="" type="checkbox"/> health data<br><input checked="" type="checkbox"/> data revealing religious/philosophical beliefs<br><input type="checkbox"/> data revealing trade union membership<br><input type="checkbox"/> data revealing racial or ethnic origin<br><input type="checkbox"/> data concerning a natural person's sex life or sexual orientation<br><input type="checkbox"/> data revealing political opinions<br><input type="checkbox"/> genetic data<br><input type="checkbox"/> biometric data for the purpose of uniquely identifying a natural person<br><input type="checkbox"/> data concerning criminal convictions and offences <p>2. Justification for processing:</p> <input checked="" type="checkbox"/> data subject's explicit consent<br><input type="checkbox"/> relates to personal data made public by the data subject<br><input type="checkbox"/> Processing necessary to meet obligations in field of employment, social security and social protection law<br><input checked="" type="checkbox"/> Processing necessary to protect data subject's or other |

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|                                    |  | <p>natural person's vital interests where data subject incapable of giving consent</p> <p><input type="checkbox"/> Processing necessary for establishment, exercise or defence of legal claims</p> <p><input type="checkbox"/> Processing necessary for reasons of substantial public interest</p> <p><input checked="" type="checkbox"/> Processing necessary for medical/health care</p> <p><input type="checkbox"/> Processing necessary for public health</p> <p><input type="checkbox"/> Processing necessary for archiving, research or statistics</p>   |
| <b>IV. Rights of Data Subjects</b> |  |  |
| 14.                                | Privacy statement (Information provided to the data subject)                               | <p><input checked="" type="checkbox"/> Data collected from data subject</p> <p><input type="checkbox"/> Data not obtained from data subject</p>  |
| 15.                                | Manner of providing the privacy statement to the data subjects (procedure to grant rights) | <p><i>Please suggest what you believe would be a reasonable way to provide the privacy statement, such as a reference in the first correspondence with the data subject to a link to the EEB2 website where the statement can be viewed.</i></p> <p><input checked="" type="checkbox"/> online</p> <p><input type="checkbox"/> email</p> <p><input type="checkbox"/> text (by phone number)</p> <p>Specify:</p>  |
| <b>V. Access and disclosure</b>    |  |  |
| 16.                                | Recipients of the data   | <p><i>Please specify any recipients outside of EEB2 that receive the data e.g. OSG, banks, travel agencies, etc.:</i> Travel agents, hotels</p>  |
| 17.                                | Transfers to non-EU countries or international organisations                               | <p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>If transfers are made, specify:<br/>Non-EU country to which transfers made: Switzerland, China</p> <p>Basis of transfer:</p> <p><input checked="" type="checkbox"/> Adequacy decision relating to recipient country (Andorra, Argentina, Canada (commercial organisations), Faroe Islands, Guernsey, Israel, Isle of Man, Jersey, New Zealand, Switzerland, Uruguay and the US (limited to the Privacy Shield framework)</p> <p><input type="checkbox"/> Appropriate safeguards established</p> <p><input checked="" type="checkbox"/> Derogation:</p> <p><input checked="" type="checkbox"/> Data subject's explicit consent</p> <p><input type="checkbox"/> Transfer necessary for performance of contract with data subject</p> <p><input type="checkbox"/> Transfer necessary for performance of contract with other on data subject's behalf</p> <p><input type="checkbox"/> Transfer necessary for important reasons of public interest</p> <p><input type="checkbox"/> Transfer necessary for establishment, exercise or defence of legal claims</p> <p><input checked="" type="checkbox"/> Transfer necessary to protect vital interests of data subject or others where data subject incapable of giving consent</p> <p><input type="checkbox"/> Transfer of data from a public register</p> |
| 18.                                | Is a Data Protection Impact Assessment required?   | <p><input type="checkbox"/> No</p> <p><input checked="" type="checkbox"/> Yes, because the processing involves high risk of the following type:</p> <p><input checked="" type="checkbox"/> Sensitive data or data of a highly personal nature</p> <p><input checked="" type="checkbox"/> Data concerning vulnerable data subjects</p> <p><input type="checkbox"/> Data processed on a large scale</p> <p><input type="checkbox"/> Systematic monitoring</p> <p><input type="checkbox"/> Evaluation or scoring</p> <p><input type="checkbox"/> Innovative use or applying technological or organisational solutions</p> <p><input type="checkbox"/> Automated decision making with legal or similar</p>   |

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|  |  | significant effects<br><input type="checkbox"/> Prevents data subject from exercising a right or using a service or a contract |
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