



EEB2
CONTROLLER'S RECORD OF PERSONAL DATA
PROCESSING ACTIVITY

Item No.		
1.	Name, department and e-mail address of Delegated Controller (author)	Isabelle Overbergh isabelle.overbergh@eursc.eu EEB2 Enrolments' secretariat
2.	Name, department and e-mail address of Joint Controller (if any) - attach arrangement between Joint Controllers	Evelyne Chang evelyne.chang@eursc.eu Central Enrolment Authority (CEA) – Office of the Secretary General of the European Schools (OSG)
I. Processing Activity		
3.	Name of processing	Pupil enrolment application process
4.	Description and purpose of processing	<p>Applications for enrolment in one of the Brussels European Schools and supporting documents are submitted to EEB2 when EEB2 is the pupil's legal representative's first choice of school. The pupil's legal representatives often submit the application in person and discuss various aspects of the application with the enrolments secretariat (e.g. practical information about the school, the choice of the language section for the pupil, etc.). The enrolments secretariat at EEB2 verifies the information submitted to ensure that the application is complete in accordance with the "Policy on enrolment in the Brussels European schools" (ref. 2017-12-D-5-en-3). The Deputy Director of Nursery/Primary or Secondary, as appropriate, reviews the file and decides on the appropriate grade level and language section of the applicant.</p> <p>When the enrolment application is complete, a summary of the application with the data required to check eligibility of the applicant with the Deputy Director's decision is submitted to the CEA (within the OSG) through the software developed by the OSG.</p> <p>The CEA then analyses the information submitted and awards a place to the applicant in one of the Brussels European Schools. The CEA notifies the applicant of its decision, and informs each school of the applicants allocated to it.</p> <p>If an application has been submitted to EEB2 but the child is thereafter enrolled in another Brussels European School, the EEB2 enrolment secretariat forwards the original documents to the school where the pupil is enrolled.</p> <p>Where the pupil's legal representative is not satisfied with the school allocated by the CEA, he/she may launch an appeal. In such cases, and for transfer applications and enrolment applications with particular circumstances (for choice of one school), the paper file is scanned and the scanned file, together with all correspondence between EEB2 and the pupil's legal representative, is forwarded to the CEA secretariat, following CEA instructions.</p>
5.	Name and e-mail address of processor (sub-contractor)	

6.	Does the processing operation involve any automated decision-making/profiling?	<input type="checkbox"/> Automated <input checked="" type="checkbox"/> Manual (not automated)
7.	Storage media	<input checked="" type="checkbox"/> Paper <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 <input type="checkbox"/> ___ weeks <input type="checkbox"/> ___ months <input type="checkbox"/> ___ years <input checked="" type="checkbox"/> other (explain)
<ul style="list-style-type: none"> • For pupils enrolled at EEB2, the enrolment application becomes part of the pupil's file which is retained as explained in the privacy statement for Pupil Enrolment in School; • For pupils who are enrolled in another European School at the conclusion of the application process, the original file is sent to that school; • For applicants who withdraw their application, the file is retained at EEB2 until the pupil is 18 years old; • For transfer applications and enrolment applications with particular circumstances (e.g. supporting an application to one school, especially for medical reasons), the paper file is scanned and the electronic file thereby created, together with all correspondence between EEB2 and the pupil's legal representative, is forwarded to the CEA in accordance with CEA instructions. The files are retained by EEB2 until the pupil is 18 years old. 		
II. Legal basis		
9.	Legal basis of processing	<input type="checkbox"/> Data subject's consent (attach blank consent form) <input type="checkbox"/> Necessary for compliance with legal obligation <input type="checkbox"/> Necessary to protect data subject's vital interests <input checked="" type="checkbox"/> Necessary for performance of task carried out in the public interest or in controller's official authority <input type="checkbox"/> Necessary for legitimate interests of controller or 3 rd party <input type="checkbox"/> Necessary for performance of contract
III. Data		
10.	Categories of data subjects	<input checked="" type="checkbox"/> Pupils <= 16 yrs old <input checked="" type="checkbox"/> Pupils > 16 yrs old <input checked="" type="checkbox"/> Parents <input type="checkbox"/> PAS <input type="checkbox"/> Seconded staff (excluding teachers) <input type="checkbox"/> Seconded staff (teachers) <input type="checkbox"/> Locally recruited staff <input type="checkbox"/> Interim staff <input type="checkbox"/> (Successful) candidates (to a vacancy) <input type="checkbox"/> Unsuccessful candidates (to a vacancy) <input type="checkbox"/> Trainees <input type="checkbox"/> Vendors <input type="checkbox"/> Other (specify)
11.	Categories of personal data collected	<input checked="" type="checkbox"/> Name <input checked="" type="checkbox"/> Surname <input checked="" type="checkbox"/> Date of birth <input checked="" type="checkbox"/> City of birth <input checked="" type="checkbox"/> Country of birth <input checked="" type="checkbox"/> Nationality

		<input checked="" type="checkbox"/> Gender <input checked="" type="checkbox"/> Data concerning siblings <input checked="" type="checkbox"/> School email address <input checked="" type="checkbox"/> Personal email address (for legal representatives or pupils =>18 yrs) <input checked="" type="checkbox"/> Professional email address <input checked="" type="checkbox"/> Professional phone number <input checked="" type="checkbox"/> Personal phone number <input checked="" type="checkbox"/> Home address <input checked="" type="checkbox"/> Picture <input type="checkbox"/> Student ID number <input checked="" type="checkbox"/> Parental marital status <input checked="" type="checkbox"/> Name of legal guardian (main custody of the child) <input type="checkbox"/> Salary or economic information <input checked="" type="checkbox"/> Other (specify) - Institution/employer of pupil's legal representative - Type of contract (to determine the category) - Reference number for dossier (automatically generated by CEA application)
12.	Documents collected containing personal data	<input checked="" type="checkbox"/> Copy of passport <input checked="" type="checkbox"/> Copy of ID <input type="checkbox"/> Copy of transport document <input checked="" type="checkbox"/> Birth certificate <input checked="" type="checkbox"/> Marriage certificate <input checked="" type="checkbox"/> Document proving the exercise of parental authority <input checked="" type="checkbox"/> Family Court Decision (which may contain various information, e.g. financial) <input checked="" type="checkbox"/> Adoption decision <input type="checkbox"/> CV <input type="checkbox"/> Motivation letter <input type="checkbox"/> Application email of the candidate <input type="checkbox"/> Correspondence with the candidate <input type="checkbox"/> Declaration concerning the relevant professional experience <input type="checkbox"/> Declaration concerning allowances <input type="checkbox"/> Copy of relevant diploma <input type="checkbox"/> Reference letter <input type="checkbox"/> Work contract <input type="checkbox"/> Evaluation sheets
13.	Special categories of data	<i>Please specify type and justification for processing:</i> 1. Type: <input checked="" type="checkbox"/> health data <input checked="" type="checkbox"/> data revealing religious/philosophical beliefs <input type="checkbox"/> data revealing trade union membership <input checked="" type="checkbox"/> data revealing racial or ethnic origin <input type="checkbox"/> data concerning a natural person's sex life or sexual orientation <input type="checkbox"/> data revealing political opinions <input type="checkbox"/> genetic data <input type="checkbox"/> biometric data for the purpose of uniquely identifying a natural person <input type="checkbox"/> data concerning criminal convictions and offences 2. Justification for processing: <input type="checkbox"/> data subject's explicit consent <input type="checkbox"/> relates to personal data made public by the data subject <input type="checkbox"/> Processing necessary to meet obligations in field of employment, social security and social protection law <input type="checkbox"/> Processing necessary to protect data subject's or other natural person's vital interests where data subject incapable of giving consent <input type="checkbox"/> Processing necessary for establishment, exercise or

		defence of legal claims <input checked="" type="checkbox"/> Processing necessary for reasons of substantial public interest <input checked="" type="checkbox"/> Processing necessary for medical/health care (regarding the health data) <input type="checkbox"/> Processing necessary for public health <input type="checkbox"/> Processing necessary for archiving, research or statistics
IV. Rights of Data Subjects		
14.	Privacy statement (Information provided to the data subject)	<input checked="" type="checkbox"/> Data collected from data subject <input checked="" type="checkbox"/> Data not obtained from data subject
15.	Manner of providing the privacy statement to the data subjects (procedure to grant rights)	<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> <input checked="" type="checkbox"/> online <input type="checkbox"/> email <input type="checkbox"/> text (by phone number) Specify:
V. Access and disclosure		
16.	Recipients of the data	<i>Please specify any recipients outside of EEB2 that receive the data e.g. OSG, banks, travel agencies, etc.</i> CEA, other Brussels European Schools (as explained in description of processing).
17.	Transfers to non-EU countries or international organisations	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If transfers are made, specify: Non-EU country to which transfers made _____ Basis of transfer: <input 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) <input type="checkbox"/> Appropriate safeguards established <input type="checkbox"/> Derogation: <input type="checkbox"/> Data subject's explicit consent <input type="checkbox"/> Transfer necessary for performance of contract with data subject <input type="checkbox"/> Transfer necessary for performance of contract with other on data subject's behalf <input type="checkbox"/> Transfer necessary for important reasons of public interest <input type="checkbox"/> Transfer necessary for establishment, exercise or defence of legal claims <input type="checkbox"/> Transfer necessary to protect vital interests of data subject or others where data subject incapable of giving consent <input type="checkbox"/> Transfer of data from a public register
18.	Is a Data Protection Impact Assessment required?	<input type="checkbox"/> No <input checked="" type="checkbox"/> Yes, because the processing involves high risk of the following type: <input checked="" type="checkbox"/> Sensitive data or data of a highly personal nature <input checked="" type="checkbox"/> Data concerning vulnerable data subjects <input type="checkbox"/> Data processed on a large scale <input type="checkbox"/> Systematic monitoring <input type="checkbox"/> Evaluation or scoring <input type="checkbox"/> Innovative use or applying technological or organisational solutions <input type="checkbox"/> Automated decision making with legal or similar significant effects

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