



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	OSG
I. Processing Activity		
3.	Name of processing	Pupil enrolment in school
4.	Description and purpose of processing	<p><u>Enrolment process</u>: Once the CEA allocates a pupil to EEB2, he/she is assigned to a language section and grade level by the enrolments secretariat. A paper file and an electronic file are created for each pupil.</p> <p><u>Paper file</u>: Once a pupil is enrolled at the EEB2, the application file (paper) is transformed to a paper pupil file. The pupil file is provided to the secretariat of the Deputy Head of nursery/primary or secondary, as appropriate, which maintains the file for the duration of the pupil's enrolment at EEB2. During the school year, any correspondence with pupils' legal representative (e.g. requests for absence, to change subject, or the need to repeat a year), information about change of family situation, all updates of information provided by pupils' legal representatives (e.g. the annual update of personal data concerning the pupil), and grade reports and Class Council notes concerning the pupil are added to the pupil file. Should a pupil's legal representative submit information relating to a learning disability of the pupil either during the application process or after enrolment, the enrolment secretariat immediately transmits such information to the Learning Support Coordinator, who places the information in the pupil's learning support file. Should a pupil's legal representative submit information relating to the pupil's health either during the application process or after enrolment, the enrolment secretariat immediately transmits such information to the school nurse, who places it in the pupil's medical file. At the end of each school year, the pupil's school report is added to the pupil's file. Once the pupil leaves the school or graduates, the pupil's file is archived.</p> <p><u>Electronic file</u>: The enrolments secretariat inputs certain data concerning pupils and pupil's legal representative from the pupil's paper file to create the pupil's electronic file in MySchool (SMS). A paper form is sent with each pupil to their legal representative asking for any updates of their contact details and any change in the legal representative's employment contract with the EU institutions. When the pupil brings back the completed form, any updates are entered in MySchool by the enrolments secretariat and the paper form is placed in the pupil's paper file. If there is a change in the</p>

		<p>contract, the enrolments secretariat provides this information to the EEB2 colleagues responsible for financial administration. Pupils' legal representatives may also submit updates throughout the school year, which the enrolments secretariat enters immediately in MySchool. Once the pupil leaves the school or graduates, the pupil's date of departure is entered in the MySchool file and the pupil's file is deactivated automatically.</p> <p><u>Official List of Pupils:</u> Upon receipt from the CEA of the list of new pupils to be enrolled at EEB2, the enrolments secretariat compiles a comprehensive official pupils' list. The list is accessible electronically to authorized users in MySchool. A paper copy of the list is provided to responsible secretariats of EEB2 administration. The pupil list is updated with information on arrivals and departures of pupils whenever they occur. The enrolments secretariat informs responsible school services of such updates by email.</p> <p><u>Statistical reports:</u> EEB2 and OSG generate statistical reports (without personal data) about the pupils enrolled in EEB2 from the data entered in MySchool. Such data is used by the EEB2 administration or as required by the Administrative Board or the European Commission.</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 (Paper pupil file and Official List of Pupils) <input checked="" type="checkbox"/> Electronic (MySchool, electronic pupil file and electronic list of pupils)
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: The documents in the pupils' paper file are retained for the duration of the pupil's enrolment at EEB2, if the pupil stays until receiving the BAC; if the pupil leaves EEB2 before the BAC, then the documents are retained until the pupil is 18 years old. Where possible, original documents are returned to the pupil's legal representative. <p>Exceptions:</p> <ul style="list-style-type: none"> - the school grade reports for S5 and S7, as well as the BAC, are retained indefinitely; -the annual update of personal data concerning the pupil is retained until such update is received from the pupil's legal representative for the following year. <p>Electronic files are retained in accordance with the retention policy of the OSG concerning the SMS/My School.</p>
II. Legal basis		
9.	Legal basis of processing	<input type="checkbox"/> Data subject's consent (attach blank consent form) <input checked="" type="checkbox"/> Necessary for compliance with legal obligation (data transmitted to Belgian authorities, as explained in description of processing)

		<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 employment contract of pupil's legal representative with EU institution (to determine the category of the pupil)
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 (where necessary) <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	<p><i>Please specify type and justification for processing:</i></p> <p>1. Type:</p> <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 <p>2. Justification for processing:</p> <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)	<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> <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	<p><i>Please specify any recipients outside of EEB2 that receive the data e.g. OSG, banks, travel agencies, etc.</i></p> <p>The OSG has unrestricted access to all of the data entered in MySchool. This data is often used by OSG to generate anonymous statistics about the pupil populations attending the European Schools (further details are provided in the OSG record).</p> <p>Some of the data for each pupil in MySchool and paper copies of the Official List of Pupils are provided to the responsible APEEE school services.</p> <p>The list of EEB2 pupils is sent to the Belgian authorities, as required by Belgian law related to the obligation of children to attend school.</p>

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