



Controller's Record of Personal Data Processing Activity		
Item No.		
	Name, department and e-mail address of Delegated Controller (author)	Simon Sharron, Director of EEB2 (WOL-DIRECTOR@eursc.eu)
	Name, department and e-mail address of Joint Controller (if any) - attach arrangement between Joint Controllers	Mathieu Kroon Gutiérrez, PhD candidate, kroon-gutierrez@ajmonnet.eu
I. Processing Activity		
	Name of processing	Support to academic research involving distribution of a questionnaire to pupils and their legal representatives
	Description and purpose of processing	<p>A PhD student from Université Cergy-Pontoise/Université de Luxembourg has requested the assistance of EEB2 to distribute a questionnaire to a group of pupils' legal representatives concerning his research. The research concerns what should be the contents of European Schools history syllabi in order to understand the present, anticipate the future and create common ground based on the learning of a shared past. It addresses the question by analyzing archive documents and through anonymous interviews and questionnaires.</p> <p>The questionnaire seeks to identify the opinions of the target audience – S6/S7 pupils and their legal representatives - about history as a school subject and the way it is taught in the European Schools. EEB2 will send a link provided by the researcher to S6/S7 pupils and their legal representatives. It is fully within their discretion to answer the questionnaire. If they choose to provide a reply, they will do so directly via the online platform (to which EEB2 will not have access). The researcher receives the answers through the online platform and cannot see either the names or the IP addresses of the survey respondents.</p>

	Name and e-mail address of processor (sub-contractor)	historyee.limequery.com
	Does the processing operation involve any automated decision-making/profiling?	<input type="checkbox"/> Automated <input checked="" type="checkbox"/> Manual (not automated)
	Storage media	<input type="checkbox"/> Paper <input checked="" type="checkbox"/> Electronic
	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): until the researcher's PhD dissertation is written and defended, by the end of 2020.
II. Legal basis		
	Legal basis of processing	<input checked="" type="checkbox"/> Data subject's consent (attach blank consent form)(GDPR Art. 6(1)(a)) <input type="checkbox"/> Necessary for performance of contract (GDPR Art. 6(1)(b)) <input type="checkbox"/> Necessary for compliance with legal obligation (GDPR Art. 6(1)(c)) <input type="checkbox"/> Necessary to protect data subject's vital interests (GDPR Art. 6(1)(d)) <input type="checkbox"/> Necessary for performance of task carried out in the public interest or in controller's official authority (GDPR Art. 6(1)(e)) <input type="checkbox"/> Necessary for legitimate interests of controller or 3 rd party (GDPR Art. 6(1)(f))
III. Data		
	Categories of data subjects	<input type="checkbox"/> Pupils <= 16 yrs old <input checked="" type="checkbox"/> Pupils > 16 yrs old - S6 and S7 pupils <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)

	<p>Categories of personal data collected</p>	<ul style="list-style-type: none"> <input type="checkbox"/> Name <input type="checkbox"/> Surname <input 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 type="checkbox"/> Gender <input type="checkbox"/> Data concerning siblings <input type="checkbox"/> School email address <input type="checkbox"/> Personal email address <input type="checkbox"/> Professional email address <input type="checkbox"/> Professional phone number <input type="checkbox"/> Personal phone number <input type="checkbox"/> Home address <input type="checkbox"/> Picture <input type="checkbox"/> Student ID number <input type="checkbox"/> Parental marital status <input type="checkbox"/> Name of legal guardian (main custody of the child) <input type="checkbox"/> Salary or economic information <input checked="" type="checkbox"/> Other (specify): <ul style="list-style-type: none"> - Pupils: age, section, L2, how long they have been attending EEB2; - Pupils' legal representatives: occupation, educational background, partner's nationality and occupation, how many children they have in the EEB2, how long their children have been attending the EEB2, sections and L2 of their children.
	<p>Documents collected containing personal data</p>	<ul style="list-style-type: none"> <input type="checkbox"/> Copy of passport <input type="checkbox"/> Copy of ID <input type="checkbox"/> Copy of transport document <input type="checkbox"/> Birth certificate <input type="checkbox"/> Marriage certificate <input type="checkbox"/> Document proving the exercise of parental authority <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

	Special categories of data	<p><i>Please specify type and justification for processing:</i></p> <p>1. Type:</p> <ul style="list-style-type: none"> <input type="checkbox"/> health data <input 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: just nationalities <input type="checkbox"/> data concerning a natural person's sex life or sexual orientation <input checked="" type="checkbox"/> data revealing political opinions: opinions about EU integration process <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> <ul style="list-style-type: none"> <input checked="" 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 type="checkbox"/> Processing necessary for reasons of substantial public interest <input type="checkbox"/> Processing necessary for medical/health care <input type="checkbox"/> Processing necessary for public health <input checked="" type="checkbox"/> Processing necessary for archiving, research or statistics: for academic research - PhD dissertation only
IV. Rights of Data Subjects		
	Privacy statement (Information provided to the data subject)	<ul style="list-style-type: none"> <input checked="" type="checkbox"/> Data collected from data subject <input type="checkbox"/> Data not obtained from data subject
	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> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> online <input checked="" type="checkbox"/> email <input type="checkbox"/> text (by phone number) <p>Specify: Privacy statement of the EEB2 will be attached to the email sent to pupils and their legal representatives which includes the links to the questionnaires. The link to the EEB2 website where the privacy statement can be viewed will appear on the online platform where the questionnaires can be completed.</p>

V. Access and disclosure		
	Recipients of the data	The researcher/PhD candidate
	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: <ul style="list-style-type: none"> <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
	Is a Data Protection Impact Assessment required?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes, because the processing involves high risk of the following type: <ul style="list-style-type: none"> <input type="checkbox"/> Sensitive data or data of a highly personal nature <input 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

