

**Privacy Statement on the protection of personal data in relation to the interviews /
Surveys for the *Thematic Country Reviews on Upskilling Pathways***

All personal data are processed in accordance with the provisions of Regulation (EU) 2018/1725 of the European Parliament and of the Council of 23 October 2018 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/EC (hereinafter – Regulation 2018/1725).

Identity of controller:

The controller is Cedefop and the responsible department is the Department for VET and Skills (DVS).

Purpose of processing:

The data collected during the interviews/ surveys will contribute to an in-depth review of the national approaches to the implementation of the upskilling pathways recommendation in the countries under review. Responses will be summarised alongside evidence from the literature, quantitative data etc. and will contribute to a country level report.

The interviews/ surveys are organised either in person or online as agreed with the interviewee. For the latter, the EU Survey (online questionnaires) or Zoom application (virtual interviews) will be used.

Cedefop would like to reassure you that the interview/ survey will take place following a strict confidentiality protocol. Your participation will be fully anonymous and no information regarding your personal details (including affiliation) will be disclosed to Cedefop or other third parties without your consent. Each individual response will be confidential. The consortium commissioned to carry out the interviews/ surveys use experienced researchers who are bound by secrecy with respect to your individual answers. Your individual answers will not be shared or linked back to your organisation without your explicit consent.

In the case of interviews, the interviewer may also ask for your consent to tape the interview when this will be needed for the research purpose (to record your responses to the interview for ensuring their precise registration). In the case of interviews, interviewers are informed that the interview will be taped, in order to allow for the precise registration of their responses. It is to be noted that no identification information will be recorded.

Data processed:

Data collected and processed includes:

- Name¹
- Email Address¹

¹ "For these data, explicit consent is needed. The respondent should accept / sign a consent form

- Affiliation (i.e. Name and type of the organisation the respondent works for) ¹
- Answers to the interview questions
- Recorded audio of interview¹

Legal basis / lawfulness:

- Article 5(1)(a) of Regulation (EU) 2018/17252, i.e. the processing is necessary for the performance of a task carried out in the public interest, as provided for by Article 2(1)(a) and (g) of Regulation (EU) 2019/128 (tasks performed by Cedefop).
- Article 5(1)(d) of Regulation (EU) 2018/1725, i.e. in that survey participants are informed and asked to give consent where necessary.

Recipients of data:

- Cedefop DVS staff
- Staff of consortium members IRS, ISRZ acting on behalf of Cedefop (under specific contract), who will carry out the interviews/surveys on behalf of Cedefop and will share with Cedefop the summary of the responses and the analysis.
- Zoom Video Communications, Inc., as the provider of Zoom application, used as a means of online interviews.
- EUSurvey (European Commission), used for the conduction of surveys.

The retention period of the collected personal data

For the online surveys, the results will be manually deleted from EUSurvey after downloading, or at the latest during a 3 months-period from the closure of the survey.

For virtual interviews that are recorded, their audio and video recordings are manually deleted from Zoom after downloading, or at the latest during a 3 months-period from the day of the interview/ survey.

The recordings of the in-person interviews will be deleted after a 6 months-period from the day of the interview.

The summary of the responses and their analysis, including the personal data that they may contain, will be retained by Cedefop in its Records Bank for 5 years since the interviews take place.

Transfers of personal data outside the EU/EEA

Microsoft Ireland Operations Ltd., as a processor for Sharepoint (Records Bank) processes and stores most of the data, including all content data and all customer data at rest, in the EU/EEA (geolocation of Cedefop as the tenant). Limited sets of personal data might be transferred for provision of the services and technical support purposes to Microsoft Corporation located in the US and acting as a sub-processor. Any transfers to Microsoft Corporation are covered by the recently adopted EU-US Data Privacy Framework (2023), of which Microsoft Corporation with its 18 entities are active participants.

² Regulation (EU) 2018/1725 of the European Parliament and of the Council of 23 October 2018 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data

Zoom Video Communications, Inc., as the provider of Zoom, the video-conferencing platform used for this event, operates globally and may transfer personal data outside of the EU/EEA when providing services in the EU. These data transfers are taking place based on an adequacy decision for the country where the data are transferred and stored, or, in the absence of such an adequacy decision, based on the European Commission's Standard Contractual Clauses. In addition, Zoom with its 3 entities complies with the recently established EU-US Data Privacy Framework (2023) as a self-certified US-based company, when transferring and storing data in the US.

Data subject's rights:

You have the right to request from the controller access to and rectification or erasure of your personal data or restriction of processing.

You also have the right to object to the processing of your personal data.

If you have given consent to any of the related processing activities, this can be withdrawn at any time, without undermining the lawfulness of processing undertaken until that point.

To exercise the mentioned rights, you may contact the controller by sending an email to: info@cedefop.europa.eu

The controller shall provide information on action taken on a request within one month of receipt of the request. That period may be extended by two further months where necessary, taking into account the complexity and number of the requests.

If you consider your data protection rights have been breached, you may always lodge a complaint with the Cedefop's Data Protection Officer (data-protection-officer@cedefop.europa.eu) or with the European Data Protection Supervisor (edps@edps.europa.eu).

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