

## Privacy Statement

### Processing of personal data in the context of the organisation of Cedefop event

# VET in action Evidence from implementing EU priorities in national VET plans

17 April 2024

Virtual get-together

All personal data collected by the European Centre for the Development of Vocational Training (Cedefop) 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.

#### Data controller

The controller for the data processing is Cedefop and the responsible department is its Department for VET and Qualifications.

#### Purpose of processing

To facilitate and ensure the efficient organisation and management of the virtual event and to support awareness-raising and promotion of the event.

#### Description of processing

The organisation and management of the virtual event involves invitation/registration of participants; creation of participant lists and reusing them for the following Cedefop events; use of teleconferencing application (Teams); event recording for publishing purposes; awareness-raising and promotion of the event via news and publications, including Cedefop's website or social media channels such as X, Facebook, LinkedIn.

- Participants will be invited to register online for the event either with a personalised email (sent to them by Cedefop) including a link to register and/or through social media posts.
- Participants will register by filling out a form using the EU Survey platform ([Privacy statement](#)).
- Registered participants will later receive from Cedefop another email with a customised link to access the event.
- Management of contact data and creation of participants list.
- The virtual event will take place using the Teams video conferencing system.
- Audio, video and chat contents will be recorded using Teams functionality. Regarding the processing of personal data by Microsoft Teams, please consult [Cedefop's privacy statement on Voice-video calling and instant messaging using MS Teams](#).
- OBS Studio ([Privacy statement](#)) will be used to stream the feed from MS teams to Youtube
- Cedefop's Youtube ([Privacy statement](#)) channel will be used to stream/broadcast the event online and disseminate to the general public after the event. The processing of personal data contained in the videos is allowed only in the course of a purely personal or household activity.
- Slido and Jamboard may be used to enhance participant interaction during the event.
- Screenshots, quotes (and the communication / promotional materials created from them) may be

published via Cedefop's website, publications and/or social media channels.

- Consent will be requested for the following further processing:
  - ✓ Inclusion of specific personal data (name, surname, organisation, title, and/or country etc.) in the participant list.
  - ✓ Cedefop to use contact information provided by participants for this event to invite them to other Cedefop events and/or future activities.
  - ✓ A photograph (screen shot) of the event participants (family photo) might be taken during the event for publicity purposes. Participants who do not wish to appear in videos or photographs will be able not to use their web cameras. An option to upload a photo in Zoom will be offered showing when participant camera is off without containing any other personal details.

### Legal basis

The lawfulness of the processing is defined by Article 5(1)(a) of Regulation (EU) 2018/1725 in that it supports dissemination and awareness raising, defined as core tasks of Cedefop in Regulation (EU) 2019/128, and Article 5(1)(d) in that the upload of a photograph by participants, sharing of presentations, screenshots, quotes, sharing of personal data (name, surname, organisation, title, email and/or country, etc.), including participants details in a participant list which is shared with other participants of the event and the provision of contact information by participants of this event to invite them to other Cedefop events is optional, and that participants are informed and asked to give consent when necessary.

### Potential transfers to third countries

The following data transfers may take place in the framework of the organisation of this event:

1. **Microsoft Ireland Operations Ltd.**, as the provider of Sharepoint (a platform for the storage of Cedefop's documents and records) and of Microsoft Teams (the videoconferencing platform used in this event), may transfer personal data to Microsoft Corporation located in the US and acting as a sub-processor. In this case, the categories of personal data that might be transferred are limited to a) identification data, for some limited cases of Multi-factor authentication, b) diagnostic/telemetry (essential services) data, c) aggregated-service generated data and d) connected experience data (only processed but not stored in the US). 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. **Slido**, the online questionnaire tool used for this event, even though based on Slovakia, may transfer personal data to its staff and service providers, as well as to its parent company Cisco Systems, Inc. and Cisco's affiliates acting as sub-processors, for the purpose of providing its services. All these transfers of personal data are taking place based on Standard Contractual Clauses.
3. **Jamboard** platform used for the interaction of the participants during the event, follows Google's Privacy Policy, according to which Google maintains servers around the world and may process personal information on servers located outside the EU/EEAC. These data transfers are based either on the European Commission's adequacy decisions either on Standard Contractual Clauses. In addition, for EU-US data transfers, Google participates in the recently established EU-US Data Privacy Framework (2023) as a self-certified company.
4. **YouTube** platform used for sharing the event's audio and video recordings, follows Google's Privacy Policy, according to which Google maintains servers around the world and may process personal information on servers located outside the EU/EEAC. These data transfers are based either on the European Commission's adequacy decisions either on Standard Contractual Clauses. In addition, for EU-US data transfers, Google participates in the recently established EU-US Data Privacy Framework (2023) as a self-certified company.

### Data processed

Personal data of persons invited to and/or participating in the event includes:

- Data provided by participants and necessary for the organisation of the event, including: title, surname, first name, contact details (organisation/company, position, e-mail address), speakers' short bio with picture

- Teams – customer content (including meeting recordings, files, chat logs, and transcripts, and any other information uploaded while using the Services)
- Participant comments made in the chat room and the audio/video recordings of the meeting sessions
- Speakers’ quotes along with their name, surname, function and organisation
- Screenshots and quotes captured during the event
- Participants list: title, surname, first name, position, organisation/company.

### Recipients of the processed data

The recipients of your data may be:

- Cedefop staff involved with the organisation of the event.
- Microsoft Ireland Operations Ltd, as the provider of Sharepoint (a platform for the storage of Cedefop’s documents and records) and of Microsoft Teams;
- YouTube will be storing the video recording of the event;
- Cedefop staff (or external auditing bodies) involved in the evaluation, audit or any other follow up activity on this event.
- Participants (including speakers): presentations will be shared with other attendees (with consent);
- Lists of speakers, speaker biographies, and event recording will be made available online and disclosed to the wider public.
- Google that provides Jamboard, the tool for the interaction of the participants.
- Outputs of participants’ responses to questions using an online tool Slido maybe disclosed to the wider public (in case of Cedefop publications or posting online).

### Retention of data

Personal data collected by Cedefop will be retained only for as long as is necessary to permit effective organisation of the event and its required follow-up.

Full video recording of the event will be stored on Cedefop’s Youtube channel. Video recordings will be managed following Cedefop’s Record Management policy and kept according to the Cedefop Records Classification Plan and Retention Schedule.

- Participant registration personal data is kept in the records bank as long as needed for event follow-up actions. This is estimated in 6 months<sup>1</sup>;
- Participants list, event content such as presentations, reports and related documents will be kept in the records bank up to 5 years for auditing purposes<sup>2</sup>;
- When enabled, meeting recordings are saved in the OneDrive account of the meeting organiser for 90 days and then deleted automatically.
- By default, MS Teams chat messages are kept for one year and then deleted automatically.
- Metadata related to MS Teams calls and chats is kept for 30 days and then deleted automatically.
- If any of this MS Teams content qualifies as a record it should be saved in Cedefop’s Records Bank and relevant retention policies applied.
- The recording on Youtube will be publicly available for one year.

### Rights of data subjects

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

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<sup>1</sup> Cedefop’s records management retention schedule

<sup>2</sup> Cedefop’s records management retention schedule

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.

To exercise the mentioned rights, you can contact the controller by sending an email to: [VPSteam@cedefop.europa.eu](mailto:VPSteam@cedefop.europa.eu)

If you consider your data protection rights have been breached, you can always lodge a complaint with the Data Protection Officer of Cedefop ([data-protection-officer@cedefop.europa.eu](mailto:data-protection-officer@cedefop.europa.eu)) or with the European Data Protection Supervisor ([edps@edps.europa.eu](mailto:edps@edps.europa.eu)).