Cedefop record of processing activity

Record of Cedefop activities processing personal data, based on Article 31 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 1247/2002/EC.

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<tr>
<th>Nr.</th>
<th>Item</th>
<th>Description</th>
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<tbody>
<tr>
<td>1.</td>
<td>Last update of this record</td>
<td>7/11/2022</td>
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<td>2.</td>
<td>Reference number</td>
<td>CDFNOT008 – Web Portal Registration - CRM</td>
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</table>
| 3.  | Name and contact details of controller | Cedefop – European Centre for the Development of Vocational Training  
Postal address: Cedefop Service Post, Europe 123, 570 01 Thermi, GREECE  
Telephone: (+30) 2310-490111  
Email: info@cedefop.europa.eu  

Responsible department or role:  
Head of department for Communication (DCM)  

For enquiries on processing of personal data in the web portal and CRM system, submit request to the Web Team: WebTeam@cedefop.europa.eu |
| 4.  | Name and contact details of DPO | data-protection-officer@cedefop.europa.eu |
| 5.  | Name and contact details of joint controller (where applicable) | n/a |
| 6.  | Name and contact details of processor (where applicable) |  
- Cedefop DCM, Web content and contact management’s team members  
- Web portal’s external contractor  
- Data subjects manage their own contact details through the Web portal account. |
| 7. | Very short description and purpose of the processing | The purpose of this processing operation is to enable web portal users to register and manage their own contact details and email subscriptions. The CRM allows Cedefop to communicate with contacts relevant to the field of VET, skills and qualifications and manage email campaigns to support the Cedefop activities in line with the agency’s Communications Strategy. The Cedefop CRM system is a central repository of individuals’ contact details, and if applicable, users may mention additional information such as their institution, job profile, etc. Cedefop’s CRM (SuiteCRM) is a cloud-based web application that belongs to the Web portal ecosystem, which is hosted and maintained by an external contractor. All the registrations of the Web portal are managed through SuiteCRM. To be stored in the CRM system, users need to register themselves to the Web portal and therefore give their informed consent to be contacted. They have the possibility to subscribe to various online services and receive email communications such as: - Alerts / notifications regarding new Webportal contents / updates; - Subscriptions to newsletters; - Becoming a member of a network/community;¹ - Receive information in their field of interest; - Invitations to participate in Cedefop’s surveys and/or events; - Occasionally, Cedefop may use the CRM contact details to send important corporate communication (legal basis: article 5.1a) In addition, the collection of data allows the web team to measure users’ engagement and preferences by generating statistics on the use of the system to improve the online offerings. |

¹ See record of processing operation for CDFNOT098 – Expert Networks
### Description of categories of persons whose data Cedefop processes and list of data categories

**Data subjects:** Any individual who registers to Cedefop web portal and actively consents to receiving Cedefop’s email communications.

**Data fields:**

1. **Mandatory fields**
   a. E-mail address
   b. Password (stored in an encrypted form)
   c. First name
   d. Last name
   e. Country
   f. Consent field (during the registration)

2. **Optional fields**
   a. Title
   b. Title (non-latin characters)
   c. First name (non-latin characters)
   d. Last name (non-latin characters)
   e. Preferred language(s) of communication
   f. Institution
   g. Job title
   h. Department
   i. Work phone number
   j. Mobile phone number
   k. Home phone number
   l. City
   m. Address
   n. Postal code
   o. State / Region
   p. Web URL
   q. Facebook address
   r. Twitter address
   s. LinkedIn address
   t. Picture
   u. User profile type
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| 3. | Newsletters and Email notifications  
|   | a. Subscriptions (On/Off) to various content categories and products: Events, News, Publications, Newsletters, Surveys etc.  
|   | b. User profile type (membership (On/Off) to groups and networks)  
|   | c. Topics of interest  
| 4. | Optional fields for the members of Toolkit for tackling early leaving  
|   | a. You are or were employed by:  
|   | b. In your job, do you principally:  
|   | c. What is your main reason for visiting this toolkit?:  
| 5. | Optional fields for the ambassadors of Toolkit for tackling early leaving  
|   | a. Institution type:  
|   | b. In your job, do you principally:  
|   | c. How could you contribute to this toolkit as an Ambassador?:  

These fields can be seen from the Webportal at https://www.cedefop.europa.eu/en/user/personal-details  
(Requires login)

| 9. | Time limit for keeping the data  
|   | Regularly the Webteam deletes data of users shown to be inactive. Data will be kept for as long as the active users decide so. Data subjects can subscribe / unsubscribe from specific online services e.g., newsletter, notifications, etc. Users can also unsubscribe completely from the Web portal and therefore be removed from the CRM system. Cedefop may perform periodical removals of accounts with invalid emails (e.g., bounce backs, expired domains, etc).

| 10. | Recipients of the data  
|   | In addition to the processors, the CRM’s data are provided to the assistant of Head of DCM and the assistant to Brussels office for corporate communications’ purposes.  
|   | CRM’s data may be made available to Cedefop’s external contractors for the purpose of Cedefop’s official surveys. CRM’s data may also be made available to Cedefop’s Internal Control, Performance Measurement or external bodies like EC

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2 See record of processing operation for CDFNOT098 – Expert Networks
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<td>11.</td>
<td>Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards?</td>
<td>N/A</td>
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<td>12.</td>
<td>General description of security measures where possible.</td>
<td>Data are being kept in Cedefop CRM system (SuiteCRM) a cloud-based web application. SuiteCRM belongs to Web portal system infrastructure. Access to the system is given to the Webportal external contractor, a limited number of Cedefop’s staff and is secured by users’ credentials. Modern security measures are in place.</td>
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<td>13.</td>
<td>For more information, including how to exercise your rights to access, rectification, object and data portability (where applicable), see the privacy statement:</td>
<td>Privacy Statement available on website and also linked to from emails received: <a href="https://www.cedefop.europa.eu/en/content/privacy-statement">https://www.cedefop.europa.eu/en/content/privacy-statement</a></td>
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