

REGISTER NUMBER: 819

NOTIFICATION FOR PRIOR CHECKING

Date of submission: 03/01/2012

Case number: 2012-0007

Institution: EACEA

Legal basis: article 27-5 of the regulation CE 45/2001⁽¹⁾

(1) OJ L 8, 12.01.2001

INFORMATION TO BE GIVEN⁽²⁾

(2) Please attach all necessary backup documents

1/ Name and address of the controller

Education Audiovisual and Culture Executive Agency, Avenue du Bourget 1, BOUR, BE-1140 Brussels

2/ Organisational parts of the institution or body entrusted with the processing of personal data

The Director, BOUR 04/60

3/ Name of the processing

Call for expression of interest for selection of experts - Selection and management of experts

4/ Purpose or purposes of the processing

The purpose of the processing is the management and administration of the selection procedure for external experts on a basis of calls for expression of interest in line with Article 179a of the Financial Regulation, read together with Article 265a of its Implementing Rules, for tasks involving assistance in evaluating proposals and grant applications or tenders for procurement procedures, and for providing technical assistance in the follow-up, as well as the final evaluation of projects financed by the budget.

5/ Description of the category or categories of data subjects

Applicants for an assignment as external experts, potential experts contained in EACEA's expert's database, selected experts.

6/ Description of the data or categories of data (*including, if applicable, special categories of data (article 10) and/or origin of data*)

Data relating to the evaluation of personal aspects of the data subject (such as his or her ability, efficiency and conduct)

Other categories of data processed

First Name - Family Name - Date of Birth - Gender - First Nationality- Second Nationality- Street Name & n° - Town/City - Country - Postal Code- PO Box- Phone number - Fax- Email - Types of Expert- Skills (Linguistic / Numerical / IT / Project Management) - Employment History - Current Organisation - Job Title - Organisation Name - Street & n° - Town/City - Postal Code - Organisation Type - Department - Employment Records - Languages (mother tongue + other). Based on a self assessment details and information on: Accounting skills, Financial Analysis Skills, relevant work experience for the application, motivation for applying

Bank Account Validation file and supporting documents (account number, name of the account holder, address of the bank, IBAN and BIC codes).

Legal Entity File and supporting documents (Passport/Identity card (natural persons), VAT number, membership in a trade or professional organisation).

7/ Information to be given to data subjects

In the database, before filling in their data, applicants have to click on a button which brings them to the screen with the Privacy Statement. They have to confirm that they have read and accept the Privacy Statement.

In addition, data subjects are informed about the possibility to delete or temporarily withdraw their application or profile by the "Application instructions" and the Privacy statement published on EACEA's website.

A data protection clause is included in the contract with the expert.

8/ Procedures to grant rights of data subjects (*rights of access, to rectify, to block, to erase, to object*)

The data subjects may exercise their rights as described in the above privacy statement.

In case experts wish to verify which personal data is stored, have it modified or corrected, they may do this online. The password they set during registration will allow experts to log in to the system and update their personal information contained in your account. If they want to update their information contained in a specific application or to withdraw their application(s), they may contact the EACEA External Helpdesk.

If experts decide to temporarily withdraw their application, either by doing it themselves in their online account or by contacting the EACEA, the application will be set to invisible for EACEA's staff members. Experts may re-activate their application at any time by contacting the EACEA External Helpdesk

If candidates want to delete their account, they can send their request by e-mail to the Controller, as specified in the "Applicants instructions".

In addition, experts can contact the Controller or EACEA's Data Protection Officer at any time.

As described in the experts manual and in this notification, data subjects are given access to their evaluation results:

The call for expression of interests sets clear eligibility criteria for the inclusion in the database. After EACEA has carried out the eligibility check, experts fulfilling these criteria are included in the database and informed about their inclusion. Rejected experts who did not meet the eligibility criteria are informed about their rejection and that they may update their profile at any time.

When it comes to the selection procedure for a specific appointment, shortlisted experts are informed about their inclusion on the shortlist. All these shortlisted experts, whether appointed, put on a reserve list or not appointed, will be informed individually about the decision concerning them. By contrast to the staff selection procedures, there is no ranking of the experts, nor an allocation of points, nor comparative grids etc.

9/ Automated / Manual processing operation

Activity in the frame of which the processing is carried out

This notification concerns the Call for expression of interest for the selection and management of experts of the Education, Audiovisual and Culture Executive Agency ("EACEA"), covering the execution of contract and additional purposes such as statistic, reporting and auditing. The experts cover the full range of programmes delegated by the Commission to the Agency in the fields of education, audiovisual, culture, youth and citizenship.

The appointment of experts follows the publication of a call for expression of interest which is published in the Official Journal for the establishment of a list of experts to assist the Agency in the framework of the management of the European programmes in the fields of education, audiovisual, culture, youth and citizenship.

The expert database is managed with the help of an informatics database tool. This database contains professional data of external scientific experts who may be called upon to carry out advisory work for EACEA. The experts' professional data are recorded in the database to enable EACEA and in certain cases the Europe

The expert database is used for the management of experts who assist the Agency in the performance of the following tasks:

- (a) Evaluating proposals received in response to calls for proposals.
- (b) evaluating and monitoring projects (evaluating project reports, evaluating project products and results, project monitoring and site visits, any other tasks relating to the analysis and/or monitoring of programmes and projects)
- (c) specific studies and analyses relating to fields of activity.

The expert tool is an application that is performing two functions: the recruitment and the management of experts on the one hand and the recruitment of Agency staff on the other. To this end a contract was concluded with an external service provider following an open call for tenders. Regarding the use of the tool in the recruitment procedures, this has been notified in a separate notification to the DPO and the EPDS (see notification "Temporary Agents selection procedure"). However, staff members within the operational units only have access to the information concerning experts but not to information concerning applicants to the Age
The database is accessible within the Agency to three categories of users: within the operational units: "Recrui

Recruiters and Coordinators are located within the 10 operational units of the Agency who call upon the services of experts for the tasks described above. Within each operational unit only designated persons have access to the tool. These persons can e.g. send E-mails to experts and ask them for their availability during a specific period in order to perform one of the tasks mentioned in the call for expression of interest. Recruiters and Coordinators have the same access rights in the IT Tool, in which they have a role as "User". They have normally access to the expert's data who have expressed their interest for the programmes/actions managed by the recruiter's unit. However, a recruiter/coordinator can also have access to the information concerning other experts (this can be used e.g. in order to check whether an expert was already engaged by another unit during the same period). The Superusers however perform their function not only for the expert part of the database but also for the part of the database dealing with staff recruitment. The Commission services and other parties related to the Commission (EU bodies and Agencies) can ask the

The selection and management procedure is detailed in the "Manuel pour la selection et la contractualisation des experts". This manual includes several reminders and instructions to staff with regard to the protection of personal data (cf. in particular page 4, section 2.A). In particular, instructions are given to staff members concerning:

- data supplied by the experts which are irrelevant or excessive to what is requested for the purpose of the procedure shall not be processed by staff members,
- intra and inter-institutional recipients of data relating to the procedure are reminded that the data should not be processed for other purposes than the selection and management of experts. A model clause for the transfer of personal data to other EU institutions and bodies has been included in the Manual,
- the end-users' attention is called to the limited nature of the validity check that the Agency is carrying out when validating the applications. It is therefore suggested to use the database as a pool of applications, rather than as a pool of experts whose skills and reliability have already been carefully checked by EACEA in each case.

Working procedure followed within the framework of this activity

The general procedure for the selection and management of experts is the following:

Step 1: Applications of experts by online application

Experts apply by encoding their data in the online system. The document "Applications instructions" published on the Agency's website informs the data subjects on the technical side of how to complete and submit an expert application.

The personal data provided by the candidates are only used within the framework of the expert selection procedure. The candidate experts select the programme/action for which they want to work as an expert and then complete and submit their applications. Candidates can apply for any programme/action for which they have the required expertise but they may only apply once for each programme/action.

Before registering, the candidates need to accept explicitly the Privacy statement according to Art 11 of Regulation (EC) n° 45/2001 by confirming "I have read and I accept the Privacy Statement." YES or No. In the case the applicant chooses "No" he is informed that his application cannot be accepted and that he cannot pro
For their first application experts are directed through an automated registration process (creation of an on-line

Data concerned

The online application is divided into five sections.

Generic information:

- Personal information allowing the identification of the candidate: title, surname, first name, date of birth.
- Information provided by the candidate to contact the candidate: street, postcode, place, country, telephone and fax number, email address.
- Information provided by the candidate to allow the verification of the eligibility and selection criteria as laid down in the vacancy notice: nationality, education and training (diploma awarded), professional experience (job title, length, company name, company type and web address of company, main tasks and responsibilities), personal skills and competencies (ex. Skills/expertise in project management, financial analysis skills, accounting skills etc).

Once the experts have created their account and provided this “generic” information, it automatically appears in any subsequent application(s) that experts undertake.

The following sections are not generic but are specific to the programme(s) experts are applying for:

- Fields of Expertise;
- Additional Documents: Motivation letter, List of publications.

Regarding the reasons for collecting the data relating to the nationality and second nationality in the application form, EACEA would like to clarify the following:

The collection of data relating to the nationality is necessary for checking the fulfilment of the eligibility criteria of the applicant expert. Under the call for expression of interest, the nationality of a member state of the European Union forms an eligibility criterion. In various cases experts with a double nationality (third country and European Union member state nationality) apply for an appointment as an expert. To allow these experts to work for the Agency, it is necessary for the concerned expert to have the opportunity to provide complimentary information about his/her EU member state nationality so as to meet the eligibility criteria. In addition, as set out under section 4) of the Manuel pour la sélection et la contractualisation des experts (hereinafter 'the Manuel'), the decision for a specific appointment of an expert should ensure a balance of nationalities of the experts, so that EACEA need to take in account the nationality of the expert. However, it is i

When all sections have been completed, a submission link appears on the Summary page; by clicking on the "

An application is always related to one of the programmes/actions. If experts want to work for several programmes/actions, they have to fill in a separate application for each programme/action they wish to apply for. When candidates make a second or subsequent application (e.g. for another programme), the system retrieves the information they entered in the first (or most recent) application (see above "generic information"). The expert tool distinguishes between the following programmes/actions:

- LLP Comenius,
- LLP Erasmus
- LLP Grundtvig
- LLP Jean Monnet
- LLP Leonardo da Vinci
- LLP Key activity 1: Policy cooperation and innovation
- LLP Key Activity 2: Languages
- LLP Key Activity 3: ICT
- LLP Key Activity 4: Dissemination and exploitation of results
- Erasmus Mundus
- Erasmus Mundus External Cooperation Window
- ICI actions (USA, Canada, Japan, Australia, New-Zealand, South Korea)
- Culture Programme
- Youth in Action Programme
- Europe for Citizens Programme
- Media Programme
- Tempus Programme
- EURYDICE

In addition, whilst registering experts can accept the additional opportunity to work with other Commission dep:

Incomplete applications and withdrawn applications:

As outlined in the "Application instructions" available on the Internet site, if candidates want to withdraw their application, or one of several applications, they can do that by clicking the "withdraw" button, up until the deadline for application expires. After the deadline, they can contact the EACEA helpdesk and ask to be withdrawn from the procedure. These requests for withdrawal occur for example when an expert has a temporary conflict of interest because he was recruited by the Commission. In this case it happens frequently that the expert does not want to be deleted from the database, but set to a "sleeping mode" (=the withdrawn status). In these cases, applicants may contact EACEA at any time to re-activate their account. Applications remaining as "withdrawn" will be deleted after the closure of the call.

If an application file remains incomplete, the concerned applicant receives an e-mail reminder after 3 months from the last modification of the incomplete application. This notification is sent to the expert to inform him that his incomplete application may be updated. A second and final reminder is sent after another 3 months inf

Step 2: Screening and Eligibility check

Designated staffs in EACEA's operational units carry out an eligibility check, on the basis of the published eligibility criteria like nationality, the fact that the applicant is a natural person and the number of years of required relevant working experience.

Apart from those detailed in Section 1 above, no other information is collected on the on-line application forms or during the procedure which leads to the inclusion in the database. For example, the applicants are not required to attach to their applications their photographs, their curriculum vitae, references, diplomas, criminal records, copies of publications or any other documents. Nor does EACEA use any database for background check or carry out any background research on its own on the candidates. Thus, EACEA's decision on eligibility of a candidate is based entirely on the text of the application, as submitted by the applicant. EACEA does not check the accuracy or veracity of the information submitted by the applicant.

Step 3: Establishment of a list of eligible experts

The applications will be judged according to the criteria laid down in point 4.3 of the Call. On the basis of the eligibility check the operational units establish two lists for each programme/action: a list with experts (accepted) and a rejected list. The lists are submitted to the Agency Director or the Head of LLP Department (LLP = Lifelong Learning Programme) for decision. The list submitted to the Director/ Head of LLP Department contains the following information:

- Name of the programme/action
- Name of the evaluators and a declaration of absence of conflict of interest signed by them
- The number of applications received between two dates
- The eligibility criteria
- The number of accepted applicants (list in annex)
- The number of rejected applicants and the reasons for their rejection (list in annex)
- A consolidated table concerning the selection of experts which also includes the names of experts per programme who were accepted previously

Step 3 takes place at least once a year by each unit for the experts who appear as "new" in the expert tool.

Rejected experts who did not meet the eligibility criteria are informed about their rejection and that they may update their profile with work experience acquired after the closing of the Call. If the expert informs the relevant Unit of this additional work experience required to fulfil the eligibility criteria, the Unit gives the expert the possibility to update his profile. The updated information will be re-evaluated and, if the eligibility criteria are met by the expert, the expert will be included as "new" in the database. The update possibility is why the profiles of ineligible candidates are kept in the database, of course unless requested otherwise by the expert concerned.

As explained above, all expert CVs declared eligible enter automatically the general database. Given the high number of experts in the database and in order to make each panel selection manageable for the Agency, operational units may opt for setting up sub-groups of experts in accordance with article 4.3 of the Call for expression of interest. This article states the criteria against which each application will be judged. This system of sub-lists, including concrete instructions to staff members, is detailed in the "Manuel" page 6, under

As a preliminary remark it should be noted that staff members are instructed by the Manual that the obligation of equal treatment implies that the inclusion of experts in the sub-lists is done according to pre-defined criteria, which are objective, reasonable and proportional to the objective.

Naturally, these sub-lists will match the program's actions or priorities and the specific competencies sought after by the Agency, as they will guide Agency staff to set up each panel of experts (see step 4. below). Examples of sub-lists: Sub-list 1 - "Proven experience in the field of non formal adult education", Sub-list 2 - "Proven experience as Producer / production consultant", Sub-List 3 "Proven experience in the field of vocational training (initial and continuing)". Experts, which are grouped on one or more sub-lists, remain nevertheless available for the other actions or programs they have applied for. Since new experts may apply all along the year (flagged as "new" in the tool), the relevant sub-lists are updated after each round of eligibility check of newly submitted CVs. This ensures that that all new eligible experts fulfilling the criteria are part of on

Step 4: Selection of experts for a specific appointment.

The manual reminds the EACEA staff about the limited nature of the validity check that the EACEA was carrying out against the eligibility criteria of the Call for expression of interest.

Each time an operational Unit wishes to make use of experts for one of the purposes defined in the call for expression of interest for experts, it will select among the accepted experts on the basis of the expert profiles in the database. Units, who have opted for the system of sub-lists relating to specific competencies mentioned above, may choose to select the experts from these sub-lists, since these experts fulfil –based on their declarations- certain pre-defined criteria. Furthermore, end-users are informed that they are bound by confidentiality and that they may not use the personal data contained in the database for other purposes than the experts' selection; management and follow up.

For the purpose of the specific appointment, the "manual for the selection and contractualisation of experts" provides that in first instance a larger group of experts will be contacted and asked for their availability during the selection process. The final selection of experts among the experts who indicated their availability is carried out by an expert's selection committee. The staff members who are part of these committees are a matter of the unit. This selection committee can also

About 30 per cent of experts should be renewed from one year's to next year's exercise and that about 10 per cent of experts should be completely new experts in the programme/action concerned (they can have worked for other programmes/actions however). In addition, the same expert can only be recruited for a maximum of 3 consecutive selection rounds for the same action.

As selection criteria the manual foresees that the list of selected experts should be balanced as far as the profiles and competences of the experts are concerned. Also the ability to work in a particular language, the ability to work on remote, geographical balance and gender can play a role. The operational units have to explain in the selection note that is attached to the file the tasks to be effected, the period and duration of those tasks, the number of experts to be invited and to be put on the reserve list (e.g. if more proposals than expected are received, or if a selected expert has to cancel his participation), the applied selection criteria. The note has to be signed by all members of the selection committee. In this note the responsible Head of Unit

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Step 5: Invitation, contractualisation and payment of experts.

Contracting takes place through a system of "Bons de commande", with an indication of the name, address and bank account of the expert, in addition to the task description, the programme concerned, the dates of execution, the daily fee and the maximum total fees. All contacts take normally place via E-mail. The experts on the reserve list are also contacted. At this step, experts are requested to submit the Legal entity file and the Bank Account Validation form, together with the supporting documents (such as ID card, passport). These documents are forwarded to DG BUDG for verification and validation.

Step 6: Monitoring of the experts work, exceptional Case of underperformance of an expert

As mentioned in the Manuel, the operational Units of EACEA are in charge to monitor the quality of the work carried out by external experts during or after these have carried out their work (Manuel Section 6 under C (2) and (3), p. 19). If in exceptional cases the performance of the work of an expert is considered to be of a significant lower quality than the average performance, taking particularly into account the quality of the work a

Step 7: Obligation of publication

The lists of experts (containing limited information, in particular: name, first name, the Community programme(s) for which the Contractor has worked, year of engagement) who participated in evaluations and other activities such as assessment of reports, monitoring visits and preparing and drafting reports, are published in any form and medium, including via EACEA's website, in accordance with the provisions of Article 20 of Commission Regulation (EC) No 1653/2004 and in line with the Judgment of the Court of 9 November 2011 in joined Cases C-92/09 and C-93/09.

10/ Storage media of data

Medium/media used for the processing operation

The processing operation is mainly performed in a computer environment provided by an external contractor. The submitting of applications and their storage is performed online. The tool is also used by Unit R1 for the recruitment of staff. However, R1 staff members do not have access to the personal data contained in the expert tool, nor have operational units access to personal data related to the staff recruitment procedures. A paper file of the expert selection is kept, cf. section 8 of the experts' manual.

11/ Legal basis and lawfulness of the processing operation

Legal basis

Council Regulation (EC, Euratom) No 1605/2002 of 25 June 2002 on the Financial Regulation applicable to the general budget of the European Communities, as last amended by Council Regulation (EC, Euratom) No 1995/2006 of 13 December 2006: Article 179a.

Commission Regulation (EC, Euratom) No 2342/2002 of 23 December 2002 laying down detailed rules for the implementation of Council Regulation (EC, Euratom) No 1605/2002 on the Financial Regulation applicable to the general budget of the European Communities, as amended: Article 265a.

Commission Regulation (EC) No 1653/2004 of 21 September 2004 on a standard financial regulation for the executive agencies, as amended by Commission Regulation (EC) No 651/2008 of 9 July 2008: Article 20.

Commission Decision C (2009) 3355 final of 6 May 2009 (delegating powers to EACEA): Article 4.

Call for expressions of interest EACEA/07 for the establishment of a list of experts to assist the Education, Audiovisual and Culture Executive Agency in the framework of the management of the Community programmes in the fields of education, audiovisual, culture, youth and citizenship (2008/C 67/09); OJ C 67 of 12 March 2008, p. 51

Grounds for lawfulness

Regulation (EC) No 45/2001, Article 5, point (a) read together with its recital 27: The processing is necessary for the performance of a task carried out in the public interest. The selection, management and evaluation of external experts assisting the Agency in the performance of certain tasks for which specific and independent expertise is necessary for the performance of EACEA's mandate.

12/ The recipients or categories of recipient to whom the data might be disclosed

Data relating to the evaluation of personal aspects of the data subject

Pre-selection:

- Administrator of the database
- Service provider for technical assistance
- Designated staff members of the Unit
- Head of Unit
- Head of Department, Director

For pre-selected experts contained in database:

in addition to the above-mentioned:

- Selection Committee members (EACEA+ Commission staff, if applicable)
- European Commission or third parties related to the European Commission (EU bodies) in the case that the expert has accepted during registration the additional opportunity to work with the Commission ("opt-in option"). However, only an indirect access is given to these parties (see above under point 4 of this notification).

Bank Account Validation file and supporting documents

Agency staff, Commission staff (DG BUDG)

Legal Entity File and supporting documents

Agency staff, Commission staff (DG BUDG)

Name, first name and the Community programme(s) for which the Contractor has worked.

Public. The information is published on the Agency's website.

In case of control or dispute, the supervisory instances of EACEA (i.e. European Commission, European Court of Auditors, OLAF etc.) and the judicial authorities (i.e. EU Courts, Ombudsman etc.).

13/ retention policy of (categories of) personal data

Rejected applications: 2 years following the closing of the Call for expression of interest. Rejected candidates who did not meet the eligibility criteria are informed about their rejection and that they may update their profile with information relating to the eligibility and selection criteria before the closing of the Call. If the expert informs the relevant Unit of this additional information (e.g. work experience, change of nationality, application as natural person) to fulfil the eligibility criteria, the Unit authorises the Helpdesk to give the expert the possibility to update his profile. The updated information will be re-evaluated and, if the eligibility criteria are met by the expert, the expert will be included as "new" in the database.

Accepted applications for experts never engaged by EACEA: 2 years following the closing of the Call for expression of interest.

Accepted applications for experts engaged by EACEA: Files relating to the selection procedure of experts, including personal data, are to be retained in the Unit in charge of the procedure until it is finalised, and in the archives for a period of 10 years following the signature of the contract. In addition, limited personal data relating to the expert may be included in the files relating to grants in which the expert has been involved. These grant files are to be retained in the Unit in charge of the procedure until it is finalised, and in the archives for a period of 10 years after the closure of the project. However, documents relating to unsuccessful grant applications have to be kept only for 3 years following adoption of the award decision.

Withdrawn applications: In case an expert withdraws one or more application(s), the expert may re-activate them at any time by contacting EACEA. Otherwise, the withdrawn application(s) will be deleted after the closure of the call for expression of interests.

Incomplete applications: three months after the application was first started a notification is sent to the expert to inform him that his incomplete application should be completed and submitted. A second and final reminder is sent after another 3 months informing the expert that he should complete and submit his application within 2 weeks otherwise the application will be deleted. If after 2 weeks the application remains still incomplete, the application will be deleted permanently. A confirmation mail is sent to the expert, informing him about the deletion of his application and that he may re-apply for a programme/action or have his account deleted at any time by contacting EACEA.

Bank Account Validation file and supporting documents

No retention at EACEA after the Bank Account Validation has been done by DG BUDG.

Legal Entity File and supporting documents

No retention at EACEA after the Legal Entity has been created by DG BUDG.

Name, first name and the Community programme(s) for which the Contractor has worked are published on the Agency's website for the two following years of the engagement (n+2).

13 a/ time limits for blocking and erasure of the different categories of data
(on justified legitimate request from the data subject)

(Please, specify the time limits for every category, if applicable)

BLOCKING

According to Article 13, paragraph 3, of EACEA's Implementing rules of Regulation 45/2001.

(1) When the data subject contests the accuracy of his/her data, the data should be blocked "for a period enabling the controller to verify the accuracy, including the completeness of the data." Thus, when receiving a request for blocking on this ground, the EACEA should immediately block the data for the period necessary for verifying the accuracy and completeness of the data.

(2) When the data subject requires the blocking of his/her data because the processing is unlawful, or when data must be blocked for purpose of proof, the EACEA will need some time to make this assessment before deciding to block the data. In such cases, even though the request for blocking may not take place immediately, it should however been dealt with promptly in order to preserve the data subject's rights. The decision as to whether to block the data is taken by the EACEA as soon as possible and at the latest within the delay of 15 working days

ERASURE

Max. 15 WORKING DAYS after the reception of the request.

14/ Historical, statistical or scientific purposes

If you store data for longer periods than mentioned above, please specify, if applicable, why the data must be kept under a form which permits identification,

15/ Proposed transfers of data to third countries or international organisations

16/ The processing operation presents specific risk which justifies prior checking (*please describe*):

The selection of experts is performed on the basis of an evaluation of their professional and technical capacity to carry out the tasks described in the call for expression of interest.

AS FORESEEN IN:

Article 27.2.(a)

Processing of data relating to health and to suspected offences, offences, criminal convictions or security measures,

Article 27.2.(b)

Processing operations intended to evaluate personal aspects relating to the data subject,

Article 27.2.(c)

Processing operations allowing linkages not provided for pursuant to national or Community legislation between data processed for different purposes,

Article 27.2.(d)

Processing operations for the purpose of excluding individuals from a right, benefit or contract,

Other (general concept in Article 27.1)

17/ Comments

Please see our cover letter.

18/ Measures to ensure security of processing (3)

Please check all points of Article 22 of Regulation (EC) 45/2001.

(3) Not to be published in the EDPS' Register (article 27.5 of Regulation (EC) 45/2001)

PLACE AND DATE: Brussels, 22.12.2011

DATA PROTECTION OFFICER: Hubert Monet

INSTITUTION OR BODY: Education, Audiovisual and Culture Executive Agency (EACEA)

To be filled out in the EDPS' office