

*(To be filled out in the EDPS' office)*

**REGISTER NUMBER: 1271**

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**NOTIFICATION FOR PRIOR CHECKING**

**DATE OF SUBMISSION: 07/10/2014**

**CASE NUMBER: 2014-0933**

**INSTITUTION: EASO**

**LEGAL BASIS: ARTICLE 27-5 OF THE REGULATION CE N° 45/2001<sup>(1)</sup>**

**INFORMATION TO BE GIVEN<sup>2</sup>**

1/ NAME AND ADDRESS OF THE CONTROLLER

EASO  
MTC Block A, Winemakers' wharf, Grand Harbour, Valletta  
MRS 1917 MALTA

2/ ORGANISATIONAL PARTS OF THE INSTITUTION OR BODY ENTRUSTED WITH THE PROCESSING OF PERSONAL DATA

Francois Bienfait  
Head, Centre for Training, Quality and Expertise (CTQE)

3/ NAME OF THE PROCESSING

E-Learning Platform

4/ PURPOSE OR PURPOSES OF THE PROCESSING

The E-Learning Platform consists of interactive e-modules covering the core aspects of the international protection procedure. The E-Learning Platform is used to deliver courses to staff in Member States' asylum administrations, including "train-the-trainer" and "national training" sessions. Personal data is processed to enable the effective administration of courses delivered through the E-Learning Platform. In addition, personal data contained in course evaluations is processed with a view to increase the quality of the courses delivered.

<sup>1</sup> OJ L 8, 12.01.2001.

<sup>2</sup> **Please attach all necessary backup documents**

#### 5/ DESCRIPTION OF THE CATEGORY OR CATEGORIES OF DATA SUBJECTS

The data subjects are primarily asylum experts from Member States that have been put forward by their National Contact Point for taking courses from the E-Platform, or for delivering training. Subject to availability, staff members of NGOs (e.g. UNHCR) may also take courses.

#### 6/ DESCRIPTION OF THE DATA OR CATEGORIES OF DATA

*(including, if applicable, special categories of data (Article 10) and/or origin of data)*

##### Trainees:

Trainees register for courses via their training National Contact Point (NCP), who submit trainees' contact information (name and surname, e-mail address), job position, and task performed at work. Trainees must register via their NCP for each course they wish to take. Once registered, they may create a profile in the E-Platform with their contact information.

Other personal data kept on the platform are time and progress reports, test results, and forum discussion threads.

##### Trainers:

Personal information on trainers is collected through the 'Training and Expert Pool'(a separate prior check notification has been submitted for the Training and Expert Pool). Once trainers are assigned to a course, they may create a profile in the E-Platform with their contact information.

The E-Learning Platform stores for each course the name of the trainer assigned to that course. Furthermore, anonymous course evaluations, completed online by trainees, are stored in the E-Learning Platform.

#### 7/ INFORMATION TO BE GIVEN TO DATA SUBJECTS

A privacy statement has been made available on the EASO internet site:

[http://easo.europa.eu/wp-content/uploads/201407-25\\_EASO\\_E-Platform\\_Privacy\\_Statement.pdf](http://easo.europa.eu/wp-content/uploads/201407-25_EASO_E-Platform_Privacy_Statement.pdf)

#### 8/ PROCEDURES TO GRANT RIGHTS OF DATA SUBJECTS

*(Rights of access, to rectify, to block, to erase, to object)*

The data subjects are informed of their rights and of the procedure to exercise them (through contact with the controller) via the specific privacy statement available on the internet site.

#### 9/ AUTOMATED / MANUAL PROCESSING OPERATION

Trainees register for courses by filling in a registration form, which is submitted to EASO by their National Contact Points (NCPs). The registration form contains contact information (name and surname, e-mail address), job position and task performed at work. Only the contact information is kept in the E-Learning Platform.

Each trainee receives a login and a password to the E-Platform through a personal email when they register for a first course. They can subsequently access their contact information to the "Profile" section and change their password or their email.

Email addresses are used by the platform to send emails but are not visible to other trainees: they are

only visible to trainers and system administrators. Once trainees are registered on the platform, their contact information, login and password are kept on the system for their potential participation to other courses. However, a separate registration form is submitted by NCPs for each additional course taken. The contact information is updated if necessary.

Trainees have their progress monitored by their trainers. Information on how long each trainee takes to complete a course module and their progress is recorded on the E-learning platform. Test results and Trainees' forum discussion threads are also kept on the platform.

Personal information on trainers is collected through the 'EASO Training and Expert Pool' (separate prior check). Trainers' login process is handled in the same way as for the trainees.

For each full training (including the online part and the face-to-face seminar), trainees are asked to complete an online course evaluation, which is anonymous. Some questions are intended to evaluate the trainers' performance. The course evaluation is stored on the E-platform.

#### 10/ STORAGE MEDIA OF DATA

All documents are stored in electronic format on the E-Platform, except for trainees' registration form and nominations of trainers/trainees from the NCPs, which are stored on a shared drive folder with access to CTQE staff in charge of course administration.

#### 11/ LEGAL BASIS AND LAWFULNESS OF THE PROCESSING OPERATION

The legal basis for the processing is Article 6, Regulation (EU) 439/2010 of the European Parliament and of the Council of 19 May 2010 establishing a European Asylum Support Office.

The processing of personal data is necessary for the performance of tasks carried out in the public interest (see Article 5(a) of Regulation (EC) No 45/2001)

#### 12/ THE RECIPIENTS OR CATEGORIES OF RECIPIENT TO WHOM THE DATA MIGHT BE DISCLOSED

EASO CTQE staff responsible for course administration has access to trainees' contact data stored in the E- Learning Platform, time and progress reports, tests results, and forum discussions. Trainees' email addresses are only visible to their trainers and CTQE staff, and not to other trainees.

CTQE staff also has access to course evaluations, including the section concerning trainers, for 12 months, after which the data is summarised and made anonymous.

Trainers have access to their trainees' name and e-mail address, time and progress reports, test results, and forum discussion threads for the duration of the course and an additional three months following its end, to allow them to respond to trainee enquiries. Trainers also have access to their own evaluations.

#### 13/ RETENTION POLICY OF (CATEGORIES OF) PERSONAL DATA

Complete course modules, including contact information, forum discussions, time and progress reports, and test results remain stored on the platform to enable trainees to access their training material for 3 months after the end of a course and for trainers to respond to any queries. After three months course modules will no longer be available to trainers or trainees.

However, time and progress reports and test results will be available to CTQE staff responsible for course administration for 12 months to enable CTQE to provide certificates for trainees. Furthermore, CTQE staff responsible for course administration shall keep contact data relating to trainees and trainers for any further communication.

13 A/ TIME LIMIT TO BLOCK/ERASE ON JUSTIFIED LEGITIMATE REQUEST FROM THE DATA SUBJECTS  
(Please, specify the time limits for every category, if applicable)

Trainees! trainers have the right to access their personal data at any time by submitting a request in writing to [training@easo.europa.eu](mailto:training@easo.europa.eu) .

Trainees/Trainers may access their contact information in the "Profile" section of the E-Platform and correct their password or email address. They may update or correct other personal data through submitting a request to EASO via their NCP.

Trainees/trainers may also ask for their personal data to be erased, by submitting a request in writing to EASO via their NCP.

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)

N/A

15/ PROPOSED TRANSFERS OF DATA TO THIRD COUNTRIES OR INTERNATIONAL ORGANISATIONS

N/A

16/ THE PROCESSING OPERATION PRESENTS SPECIFIC RISK WHICH JUSTIFIES PRIOR CHECKING (Please describe)

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

PLACE AND DATE: VALLETTA, MALTA, 10 SEPTEMBER 2014

DATA PROTECTION OFFICER: PAULA MCCLURE

INSTITUTION OR BODY: EASO