



Record of processing activity No 31 - Learning and development activities

Title	Learning and development activities
Name and contact details of controller	ECCC, People and Resources Unit – Corporate Services Sector – Human Resources (hr[at]eccc.europa.eu)
Name and contact details of DPO	ECCC Data Protection Officer: data-protection [at] eccc.europa.eu
Name and contact details of Joint Controller	N/A
Name and contact details of processor	- European Commission DG HR – owner and provider of the corporate Learning Management System “EU Learn” and related learning and development services (HR-EU-LEARN@ec.europa.eu), where used by ECCC. - External trainers, coaches, training providers, event organisers or contractors may process personal data where they support the organisation or delivery of learning and development activities, under the applicable contractual arrangements and data-protection clauses.
Purpose of the processing	The purpose of the processing is to organise, manage, monitor and evaluate ECCC learning and development activities, including training courses, workshops, seminars, conferences, coaching, mentoring, career-guidance activities, language learning, job-shadowing, onboarding-related learning, awareness-raising sessions, talent-development initiatives and related events. The processing supports the development of staff competences, knowledge, skills and organisational effectiveness, and enables ECCC to plan learning priorities, manage participation, issue certificates or attestations where applicable, reimburse or pay training-related costs where applicable, and keep appropriate records of learning activities.
Description of data subjects	ECCC staff members, including temporary agents, contract agents and other statutory staff; seconded national experts, trainees, interim staff and other persons working for or with ECCC where they participate in learning activities; External trainers, coaches, speakers, facilitators, mentors, contractors or service providers involved in organising or delivering learning and development activities; Participants in job-shadowing, career-guidance or talent-development initiatives; and other individuals involved in the organisation, approval, delivery or follow-up of learning activities.
Description of data categories	The categories of personal data processed depend on the type of learning activity and may include: Identification and employment data: first name, surname, personnel number or other identifier, administrative status, staff category, grade, unit/sector, function, office information and seniority where relevant. Contact data: professional email address, professional phone number and other contact details necessary for the organisation of the activity.

	Learning-management data: course or activity title, registration/enrolment status, participation/attendance status, withdrawal or absence, waiting-list information, approval workflow information, training history, certificates of attendance or completion, learning plans and learning needs. Career-development data: motivation for participation, objectives, competences, skills, experience, career-guidance information, coaching or mentoring information, talent-development information and information submitted in evaluation or feedback forms.
Time limits (for the erasure of data)	Training records, certificates and other documents that form part of a staff member's personal file shall be retained in accordance with the retention period applicable to personal files. Training certificates issued by "EU Learn" shall be retained in accordance with the respective retention policy.
Data recipients	Within ECCC: authorised HR staff responsible for learning and development; managers or hierarchy involved in approval workflows; staff responsible for organising the activity; finance/procurement staff where payments or reimbursements are involved; and the participant concerned. Outside ECCC: European Commission DG HR and EU Learn service administrators/course managers where the activity is managed in EU Learn; external trainers, coaches, speakers, facilitators, event organisers or contractors where necessary for the delivery of a learning activity; staff in other EU institutions, bodies or agencies for job-shadowing, interagency or talent-development activities; and bodies charged with monitoring, audit, control or investigation tasks under Union law, such as Internal Audit, the European Court of Auditors, OLAF, EPPO, the European Ombudsman and EU Courts where applicable.
Transfers to third countries	No transfer of personal data to third countries or international organisations is foreseen. If an external online learning provider or event organiser located outside the EU/EEA is exceptionally used, the transfer shall be assessed separately and documented with the safeguards required by Regulation (EU) 2018/1725 before any transfer takes place.
Security measures – General description	Processing is carried out in secure corporate systems and restricted folders. Access is limited to authorised persons on a need-to-know basis. Commission corporate systems used by ECCC, including EU Learn where applicable, are subject to the Commission security framework, including Commission Decision (EU, Euratom) 2017/46 on the security of communication and information systems. ECCC applies appropriate organisational and technical measures, including access control, confidentiality obligations, restricted storage locations, authentication and secure communication where necessary.
Privacy statement	A Data Protection Notice for Learning and Development activities is available to data subjects on the ECCC intranet. Where EU Learn is used, staff is also directed to the EU Learn privacy notice.