

**DEPARTMENT FOR COMMUNICATION (DCM)****Privacy Statement on the protection of personal data in relation to*****Web Portal Registration - CRM***

All personal data 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, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002.

Identity of controller:

The controller is Cedefop and the responsible person is Head of department for Communication (DCM).

Purpose and description of 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)

¹ See record of processing operation for CDFNOT098 – Expert Networks

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.

Data subjects:

Any individual who registers to Cedefop web portal and actively consents to receiving Cedefop's email communications.

Data categories processed:

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
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 leaving²

² See record of processing operation for CDFNOT098 – Expert Networks

- 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)

Legal basis / lawfulness:

Data are processed in accordance with article 2 of the Regulation (EU) 2019/1283, since this processing operation is required for the functioning of the institution/agency.

The lawfulness of the processing is defined by Article 5(1)(a) and (d) of the Regulation (EU) 2018/1725.

Recipients of 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 Internal Audit Service or Court of Auditors involved in Cedefop's evaluation and/or audit.

The retention period of the collected personal data

Regularly the Webteam deletes data of users shown to be inactive. Cedefop may perform periodical removals of accounts with invalid emails (e.g., bounce backs, expired domains, etc).

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.

Data subject's rights:

Data subjects have the right to access and rectify (under specific circumstances) their information, and request their erasure.

Queries and concerns regarding the processing of your personal data may also be addressed to Cedefop's Data Protection Officer at the following email: data-protection-officer@cedefop.europa.eu

Data subjects are also entitled to have recourse at any time to the European Data Protection Supervisor: <http://www.edps.europa.eu>

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³ [Regulation \(EU\) 2019/1283](#) of the European Parliament and of the Council of 16 January 2019 establishing a European Centre for the Development of Vocational Training (Cedefop) and repealing Council Regulation (EEC) No 337/75, OJ L 30, 31.1.2019, p. 90–105