



Privacy Statement on the protection of personal data in relation to

Learning and Development training records

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/EC (hereinafter – Regulation 2018/1725).

Identity of controller

The controller is Cedefop. The responsible department is Department for Resources and Support, and the responsible service is Human Resources Service.

Purpose of processing

The purpose of the processing is to identify, organise and manage learning and development activities to Cedefop staff members (Officials, Temporary Agents, Contract Agents), Seconded National Experts, trainees and interims approved by the Head of Departments, Reporting Officer(s), Reporting Officers by delegation and/or Supervisor(s) for talent development to facilitate access and keep track of activities to ensure proper functioning of the service.

Data subjects

Cedefop staff members (Officials, Temporary Agents, Contract Agents), Seconded National Experts, trainees and interims approved by the Head of Departments, Reporting Officer(s) and/or Reporting Officer by delegation and/or Supervisor(s).

Type of data processed:

Personal Data processed per category:

- **Identification data:** name, surname, department, job title of staff member, reporting officer, reporting officer by delegation, Learning and Development Officer, gender, course details
- **Contact data:** e-mail of staff member and/or reporting officer, reporting officer by delegation, Learning and Development Officer
- **Other information:** level of knowledge, expectations, post-training feedback on quality of training/session, request reasoning
- **Photo, videos, bios, meeting recordings and chat**
- **Introducing new staff:** role, background, hobbies, photo

Legal basis/ Lawfulness

The processing of personal data is necessary for the performance of tasks carried out

in the public interest and for compliance with a legal obligation to which Cedefop is subject, as per Article 5(1)(a) of Regulation (EU) 2018/1725.

Specific Legal Bases:

- Article 5(1)(d) of Regulation (EU) 2018/1725 – the data subject has given consent to the processing of his or her personal data for taking pictures/print screens with participants during sessions and/or posting of staff interviews on Cedefop's intranet.
- Staff Regulations art. 24a on EU facilitating access to training for staff members to proper functioning of the service.
- Staff Regulations of Officials and Conditions of Employment of Other Servants of the European Union (CEOS) art. 11 and 81
- Staff Regulations art. 45.2 of the of Officials stating that Officials must demonstrate before their first promotion after recruitment the ability to work in a third language among those referred to in Article 55(1) of the Treaty on European Union
- CEOS art. 85(3) of the stating that contract staff must demonstrate their ability to work in a third language before the renewal of a contract for an indefinite period for type 3a contract staff in function group IV.
- In addition, the learning and development is governed by Cedefop/DGE/39/2019 (general implementing provisions on learning and development).

Recipients of the data processed

Internal recipients

- The L&D Officer, and HR staff member who supports the L&D Officer and the Head of HR to identify learning needs and provide support;
- Head of Departments and/or reporting officers (by delegation) who approve training requests;
- Assistants of Head of Departments who monitor the training requests and department budget
- Designated Cedefop ICT administrators with access to internal application tools for L&D purposes
- Designated Finance and Procurement colleagues responsible for payments
- List of participants with access to internal database

External recipients

- Data may be accessed by external auditors during audits
- Staff members of other Agencies, if there is participation to joint event/training activity with other Agencies
- External training providers or experts
- European Commission as a provider of EU Learn and EU Survey platform provider
- Microsoft
- Webex
- Slido
- Flow Forma
- Zoom

How long is your data retained?

- individual training file: for 2 years after a staff member leaves Cedefop
- courses records: including participant list, evaluation of the course, a summary of the evaluations, and all related correspondence for 5 years after the related contract expires
- information of courses records: for 2 years after the information has been superseded or has become obsolete
- staff training plan: for 2 years

Are there any transfers of your personal data to countries outside the EU/EEA?

- MS Teams (Microsoft Ireland Operations Ltd.) may transfer personal data for technical support purposes to Microsoft Corporation located in the US and to the entities affiliated to it. Such transfers are based on the European Commission's adequacy decisions or Standard Contractual Clauses. Please refer to the [specific privacy statement](#).
- Slido (Cisco Systems, Inc.) may transfer personal data for technical support purposes to US and other countries based on the European Commission's adequacy decisions, Standard Contractual Clauses and/or Binding Corporate Rules. Please refer to [Slido privacy statement](#).
- Webex (Cisco Systems, Inc.) may... transfer personal data for technical support purposes outside the European Economic Area, to US based on EU Binding Corporate Rules and EU Standard Contractual Clauses. Please refer to .
- Zoom may transfer personal data for technical support, marketing, advertising and analytics purposes to California and other US states based on European Commission's Standard Contractual Clauses. Please refer to .

What are your rights and how can you exercise them?

You have the right to request from the controller access to and rectification or erasure of your personal data or restriction of processing.

You also have the right to object to the processing of your personal data.

If you have given consent to any of the related processing activities, this can be withdrawn at any time, without undermining the lawfulness of processing undertaken until that point.

To exercise the mentioned rights, you may contact the controller by sending an email to: hr_data_protection@cedefop.europa.eu. The controller shall provide information on action taken on a request within one month of receipt of the request. That period may be extended by two further months where necessary, taking into account the complexity and number of the requests.

For further inquiries, you may refer to Data Protection Officer of Cedefop (data-protection-officer@cedefop.europa.eu). Finally, if you consider your data protection rights have been breached, you may lodge a complaint with the European Data Protection Supervisor as the supervisory authority using a dedicated complaint form: https://edps.europa.eu/data-protection/our-role-supervisor/complaints_en (see further contact information at https://edps.europa.eu/about-edps/contact_en).

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