



EUROPEAN EDUCATION AND CULTURE
EXECUTIVE AGENCY (EACEA)

The Provision of Services to Online Language Support Photo Contest

Data Protection Notice

The European Education and Culture Executive Agency ("EACEA") is committed to preserving your privacy. All personal data are dealt with in accordance with Regulation (EU) No 2018/1725 on the protection of personal data by the Union institutions, bodies, offices and agencies¹ ("the data protection regulation").

The following Photo Contest Data Protection Notice outlines the policies by which the EACEA collects, manages and uses the personal data of the concerned individuals and describes how your personal data is processed regarding your participation in the OLS Photo Contest hosted on EU Academy. It contains information that is specific to such processing activities.

The Provision of services to Online Language Support (OLS) is an initiative of the European Commission, funded by the Erasmus+ and Erasmus Solidarity Programmes (2021-2027) and operated by a single organization for Lot 1 and by a consortium for Lot 2, under two service contracts with the European Education and Culture Executive Agency (EACEA). The Online Language Support is hosted on a corporate learning management platform of the European Commission called [EU Academy](#) that is operated by the Joint Research Centre (JRC) and DG DIGIT and is subject to a specific privacy statement (see [EU Academy Privacy Statement](#)). Processing of personal data via EU Survey is made in accordance with the applicable Privacy Statement (<https://ec.europa.eu/eusurvey/home/privacystatement>).

1. Who is responsible for processing your personal data (data controller)?

In the framework of the contest, the data controller is the European Education and Culture Executive Agency (EACEA), BE-1049 Brussels. The person designated as being in charge of the processing operation is the Head of Unit EACEA A.6 – Platforms, studies and analysis.

Email: EACEA-ONLINE-LANGUAGE-SUPPORT@ec.europa.eu

The EACEA's contractors European Service Network SA, Berlitz Language and Business Training

SARL, Tremend Benelux S.A, and Centre de Langues à Louvain la Neuve et en Woluwe (CLL) ASBL

¹ 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 Text with EEA relevance, OJ L 295, 21.11.2018, p. 39.

acting as data processors and the sub-contractor Lai-momo Società Cooperativa Sociale acting as sub-processor, process your personal data regarding your participation in the OLS Photo Contest(s) on behalf of the controller.

2. Which personal data are processed?

The following categories of personal data are processed in the framework of the Online Language Support Photo Contest:

i. Data concerning the physical characteristics of persons as well as the image or voice

Photographs, pictures, images, video and voices of you and/or other individuals that you will share when submitting your entry for the contest in a webform created in EUSurvey which link will be available in a webpage created in one of the 29 dedicated forums and accessible in each of the forums (one for each language) in the closed area of OLS in EU Academy.

ii. Data concerning the data subject's private sphere

Personal data and any public information that you may disclose in your social media profiles and in the photographs and texts (captions).

iii. Data concerning names and addresses, including email addresses

First and last names, email address, IP address and social media profiles of you and/or other individuals that you submitted in EUSurvey in order to participate in the contests and might be also requested and passed to selected business partners (i.e. VIMEO Inc and Get Your Guide) for the sole purpose of publishing the photographs and texts (captions) in the open area of OLS of EU Academy.

3. For which purpose do we process your data?

The data processing is necessary to:

- Participate in the contest.
- Collect and evaluate the contests' entries.
- Shortlisting entries and publishing photographs and texts (captions) in the open area of OLS in EU Academy to promote language learning and linguistic diversity to citizens.
- Award the winners of the contest.
- Be contacted to verify if you are available for an interview about your language learning experience using OLS. The interview will be published in the open area of OLS in EU Academy as part of the OLS Learners' stories.

4. Where is the data collected from?

Personal data are collected in three ways:

- Personal data are collected by the contractor Tremend and the sub-contractor Lai-momo, including OLS community managers from contest entries submitted by participants in a webform created in EUSurvey. The link will be available in a webpage created in one of the 29 dedicated forums and accessible in each of the forums (one for each language) in the closed area of OLS in EU Academy. Personal data might be also collected in the 29 dedicated forums for winners and shortlisted participants.

5. Who has access to your personal data and to whom is it disclosed?

Access to your personal data may be given on a need-to-know basis to the following recipients:

- **Authorised staff of the European Commission, in particular:** DG EAC, DG CNECT, Joint Research Centre (JRC) and DG DIGIT (personal data of Erasmus+ and European Solidarity Corps (ESC) individuals participating in the contest and any public information that you may disclose in your social media profiles and in the photographs and texts (captions)).
- **Authorised staff of EACEA, in particular** limited data of participants and/or other individuals that you will share when participating in the contest (e.g.: first and last name, social media profiles of you and/or other individuals that you submitted in order to participate in the contests, video, voice, images, photographs, pictures, contact email address, phone number, physical address and any public information that you may disclose in your social media profiles and in the photographs and texts (captions)).
- **Authorised staff of the processors** and their providers (sub-processors) who act on behalf and under the instructions of EACEA (e.g. first and last name, social media profiles of you and/or other individuals that you submitted in order to participate in the contests, video, voice, images, photographs, pictures, contact email address, phone number, physical address and any public information that you may disclose in your social media profiles and in the photographs and texts (captions)).

Authorised staff of the following contractors, which act as processors:

Lot 1 - Core and open learning contents

- Centre de Langues à Louvain la Neuve et en Woluwe (CLL) ASBL to award shortlisted participants with the prizes.

Lot 2 - Community Management, Open Video Production, Communication/Promotion

- European Service Network SA
- Berlitz Language and Business Training SARL
- Tremend Benelux S.A.

To collect and evaluate the contests' entries to be shortlisted for publication in the OLS open area in EU Academy, to award the shortlisted participants with the prizes.

Authorised staff of the following subcontractors, which act as sub-processors:

Lot 2 - Community Management, Open Video Production, Communication/Promotion

- Lai-momo Società Cooperativa Sociale

To collect and evaluate the contests' entries to be shortlisted for publication in the OLS open area in EU Academy, to award the shortlisted participants with the prizes.

- **General public:** publication of personal data can be made on the Internet, on EC and EACEA websites, EC corporate platforms and/or EC social media accounts (including VIMEO Inc platform – see Privacy Policy on [Vimeo](#)).

Shortlisted participants' identification (first and last name), nationality, type of mobility, country of destination, social media profiles, video, photographs, images, voices, email address and IP address of you and/or other individuals that you submitted in order to participate in the contest may be shared by the contractor Tremend and the sub-contractor Lai- momo with selected business parties such as VIMEO Inc platform.

After the conclusion of the contest, the names of the shortlisted participants and their submitted photographs and texts (captions) will be publicly announced and shared on EU Academy and on the EC and EACEA websites, newsletters, EC corporate platforms and/or EC social media channels, in which the contest or the framework of communication regarding the announcement of the shortlisted participants is made.

In addition, data may be disclosed to public authorities, and processed by these authorities in compliance with the applicable data protection rules according to the purpose of the processing, including inter alia and it is made in accordance with the applicable EACEA [OLS Data Protection Notice](#).

Please note that, in order to deliver its service, VIMEO will act as separate controller for the processing of personal data on which they determine the means and the purposes, and might transfer your personal data outside the EU in accordance with their privacy policies ([Vimeo privacy statement: Privacy Policy on Vimeo](#)).

In addition, in case of control or dispute, personal data can be shared with and processed by the bodies charged with a monitoring or inspection task in application of Union law in compliance with the applicable data protection rules and within the scope of their tasks entrusted by the relevant legislation. This includes, in particular, the following recipients: the European Court of Justice or a national judge as well as the lawyers and the agents of the parties in case of a legal procedure; the European Anti- Fraud Office (OLAF); the Internal Audit Service of the Commission; the Investigation and Disciplinary Office of the Commission (IDOC) the European Court of Auditors; the European Ombudsman; the European Public Prosecutor's Office EU courts and national authorities.

6. How long do we keep your personal data?

We collect and process your personal data until the prizes are awarded, and for a period of 5 years thereafter to advertise comparable future contests on OLS platform, on EACEA and European Commission (EC) websites, corporate platforms and/or social media accounts, and for the promotion of OLS, based on your consent which is requested upon participation. Your personal data is deleted after this period.

Photographs and texts (captions) of OLS users published on the EC and EACEA websites, EC corporate platforms and/or EC social media accounts upon consent will be removed 15 years after their publication. In case you wish to remove your photographs and texts (captions) before that date please send a request to: EACEA-ONLINE-LANGUAGE-SUPPORT@ec.europa.eu

7. What are your rights concerning your personal data and how can you exercise them?

Under the provisions of the data protection regulation, you have the right to:

- Request to access the personal data EACEA and/or the contractors and sub-contractors hold about you
- Request a rectification of your personal data where necessary
- Request the erasure of your personal data
- Request the restriction of the processing of your personal data
- Request to receive or to have your data transferred to another organisation in commonly used machine-readable standard format (data portability).

As the processing of part of your personal data is based on Article 5(1)(a) of the data protection regulation, please note that you have the right to object to processing of your personal data on grounds relating to your particular situation under the provisions of Article 23 of the data protection regulation.

Please also note that Article 25 of Regulation (EU) 2018/1725 provides that, in matters relating to the operation of EU institutions and bodies, the latter can restrict certain rights of individuals in exceptional circumstances and with the safeguards laid down in that Regulation. Such restrictions are provided for in internal rules adopted by EACEA and published in the Official Journal of the European Union: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32021Q0317%2801%29>

Any such restriction will be limited in time, proportionate and respect the essence of the above-mentioned rights. It will be lifted as soon as the circumstances justifying the restriction are no longer applicable. You will receive a more specific data protection notice when this period has passed.

As a general rule, you will be informed on the principal reasons for a restriction unless this information would cancel the effect of the restriction as such.

You have the right to make a complaint to the EDPS concerning the scope of the restriction.

8. Your right to have recourse in case of conflict on any personal data issue

In case of conflict on any personal data protection issue you can address yourself to the Controller at the above-mentioned address and functional mailbox.

You can also contact the Data Protection Officer of EACEA at the following email address: eacea-data-protection@ec.europa.eu.

You may lodge a complaint with the European Data Protection Supervisor at any time: <http://www.edps.europa.eu>.

9. On which legal basis are we processing your personal data?

The processing of your personal data is based on the following paragraphs of Article 5(1) of the data protection regulation:

(a) processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Union institution or body (to be laid down in Union Law):

- Regulation (EU) 2021/817 of the European Parliament and of the Council of 20 May 2021 establishing Erasmus+: the Union Programme for education and training, youth and sport and repealing Regulation (EU) No 1288/2013 (OJ L 189, 28.5.2021, p. 1–33)
- Regulation (EU) 2021/888 of the European Parliament and of the Council of 20 May 2021 establishing the European Solidarity Corps Programme and repealing Regulations (EU) 2018/1475 and (EU) No 375/2014 (OJ L 202, 8.6.2021, p. 32–54)
- Commission Implementing Decision (EU) 2021/173 of 12 February 2021 establishing the European Education and Culture Executive Agency
- Commission Decision C(2021)951 and its annexes delegating powers to EACEA for the management of programmes in the MFF 2021-2027