

Record of processing activity

Learning and Development activities

Record of EBA activities processing personal data, based on Article 31 of Regulation (EU) 2018/1725 (EUDPR)

Part 1 - Article 31 Record (publicly available)

1	Last update of this record	05/08/2024
2	Date of next review	05/08/2026
3	Reference number	EBA/DPR/2021/1
4	Name and contact details of controller	<p>Controller: European Banking Authority, Tour Europlaza, 20 avenue André Prothin, CS 30154, 92927 Paris La Défense CEDEX, France</p> <p>Responsible Department: Operations</p> <p>Contact: Training@eba.europa.eu</p>
5	Contact details of DPO	dpo@eba.europa.eu , or alternatively send a letter to the postal address of the EBA (address above) marked for the attention of the DPO of the EBA.
6	Name and contact details of joint controller (where applicable)	Not applicable
7	Name and contact details of processor (where applicable)	<p>The following list of processors may be involved in the processing you the personal data:</p> <ol style="list-style-type: none"> 1. European Commission, DG HR, Unit HR.B.3 – access to EU Learn learning management system. Contact details of the controller: HR-EU-LEARN@ec.europa.eu. Contact details of the DPO: https://ec.europa.eu/info/departments/data-protection-officer_en#contact 2. External providers of L&D activities: <ol style="list-style-type: none"> a. For Language training: Language Services Direct EOOD, Adress: Office 4, Floor 2, 25 Vitosha Blvd,

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Sofia, 1000, Bulgaria.

Email: ebalanguages@languageservicesdirect.co.uk

b. For coaching: Julhiet Sterwen. Address: 3 Rue des Graviers 92200 NEUILLY SUR SEINE, FRANCE.

Email: coaching-eu@julhiet-sterwen.com

c. For Management learning and development: The Greenhouse Group. Address: RUE DE LA MONTAGNE 54-56 BTE 3 1000 BRUXELLES, BELGIUM.

Email: s.pinheiro@greenhouse-group.com

For certain training activities further providers may be involved.

8	Short description and purpose of the processing activity	This processing activity allows the EBA to plan and implement Learning and Development (L&D) activities for the EBA staff, to monitor the L&D budget and the number of training days per staff member, to keep the L&D history of EBA staff (temporary agents and contract agents, SNEs and trainees on a case-by-case basis), and for the creation of statistics.
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The L&D needs of the staff member are extracted from the appraisal report. Following this a training plan is created for the whole of the EBA where an overview is given of the various L&D activities that will be organised in the course of the training plan implementation, also how individual L&D needs will be addressed.

For the general and soft skills training available in the EU Learn catalogue, enrolment is carried out through the LMS EU Learn. The applications to EU Learn courses are validated by a member of the HR Unit dealing with L&D via EU Learn. The staff member then receives an invitation to the course, attends the course and completes an evaluation sheet for the course in EU Learn.

In case of in house/online learning and development activities organised by the EBA (such as training courses, coaching, language training, other learning activities), the EBA might need to provide name and last name, email address, job title, phone number of the EBA staff to external training providers in order to be invited to attend training courses. In some cases, staff members register to the L&D activities themselves (via EBA's Learning Hub) and in other cases there are registered either by EBA HR or by external training providers. Further information about the EBA Learning Hub can be found in the relevant record: [EBA/DPR/2023/9](#).

In case staff member needs to attend an individual training course with an external provider, once the EBA authorises such a request, staff member himself/herself registers to the course, pays for the course and claims the reimbursement of costs to the EBA. In some cases, the enrolment to the individual course with external provider needs to be done by HR.

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<p>9 Description of categories of persons whose data the EBA processes and list of data categories</p>	<p>The personal data that is being processed is:</p> <ul style="list-style-type: none"> • Identification data: surname, first name, office e-mail address, telephone number, job title. • Financial data: In case of reimbursing the cost to the staff member, LEF, BAF, details of the course and cost, proof of payment, proof of attendance. • Technical data: the activity of the staff member undergoing training can lead to the generation of certain categories of technical data such as activity logs. <p>The HR Unit staff member dealing with L&D has access via EU Learn to the following data regarding the staff member undertaking the training:</p> <ul style="list-style-type: none"> • Name of the training course. • Attendance or absence to a course. • Fee involved for external learning events. • Evaluation of training course and the trainer/contractor (entered anonymously by the staff member undertaking the training).
<p>10 Special categories of personal data processed (as defined in Article 10 EUDPR)</p>	<p>No special categories of personal data are specifically required for this processing activity.</p>
<p>11 Time limit for keeping the data</p>	<p>Training records are kept by the EBA and EU Learn for the duration of the contractual relationship with the EBA and for five years after the end of the contractual relationship with the EBA.</p> <p>In the case of a formal appeal, all data held at the time of the formal appeal will be retained until the procedure is completed.</p>
<p>12 Recipients of the data</p>	<p>The personal data can be accessed by:</p> <ul style="list-style-type: none"> • Members of the HR Unit dealing with L&D at the EBA. • The Finance and Procurement Unit's staff members handling the processing of payments to the training providers will see the attendance list for a course and the accountant. • External training providers. <p>Also, if necessary, access will be given to the specialised members of the IT Unit involved in the management of the Human Resources processes and the Legal Unit in the case of complaints pursuant to Article 90 of the Staff Regulations.</p>

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<p>13 Are there any transfers of personal data to third countries or international organisations?</p>	<p>The personal data will be processed by the EBA within the EU/EEA.</p>
<p>14 General description of security measures, where possible</p>	<p>All personal data related to L&D activities is stored in electronic format and is accessible only to the authorised recipients. Appropriate levels of access are granted on an individual basis only to the above-mentioned recipients of data.</p> <p>The appraisal reports where the proposed training for each staff member is mentioned are kept in an automated e-HR application.</p> <p>Processing of personal data in the context of this processing activity is performed under the EBA Information Security Framework. EBA information infrastructure is protected with physical and technical security controls.</p>
<p>15 For more information, including how to exercise your rights to access, rectification, object and data portability (where applicable), see the data protection notice:</p>	<p>The data protection notice is available on the EBA intranet. For certain L&D activities specific data protection notices are provided directly to the data subjects.</p>
