



## Data protection statement

### Organisation of training sessions by the Professional Training department

This data protection statement concerns the European Court of Auditors' (ECA) processing of personal data in the context of the organisation and management of both online and on-site learning activities. This includes training courses, seminars, conferences, workshops and information sessions (**training**) hosted by the ECA.

Please be advised that this is a **general data protection statement** which provides you with general information about the manner in which the ECA processes and protects your personal data in the context of the organisation and the management of training. If additional data processing is expected to be carried out for any specific training course, you will be notified and informed about this in the **invitation**. Additional processing may occur if the training is to be recorded, if pictures are to be taken during the training, if there will be any specific data sharing before or after the training, etc.

For online training, in addition to this data protection statement, we also invite you to read the following data protection statements to learn about how the ECA processes personal data when using video conferencing tools.

- For the use of **Microsoft Teams** during training, please see the [statement on the protection of your personal data](#) with regard to the ECA's M365 environment.
- For the use of **Cisco Webex** during training, please see the [specific data protection – privacy statement](#).

Please note that for some training, the ECA might not be the data controller with regard to all of the processing operations (i.e. operations around the organisation and management of the training). This is the case, for example, when the external training provider (e.g. a private company) uses their video conferencing tools, such as Zoom, or other platforms over which the ECA has no control. **It is the responsibility of the company providing the online connection link to supply the data protection statement specific to their training.**

By registering for or participating in the training, you are confirming that you have read and understood the terms of the data protection statement.

### Who is responsible for handling your data?

Data processing operations fall under the responsibility of the Professional Training department (known internally as **FPR**) within the Human Resources, Finance, and General Services Directorate (the **ECA internal controller**), along with the training requester where the latter is a service or department within the ECA (e.g. an ECA directorate, a *cabinet*, the DPO, the ISO, or the Legal Service).

The ECA mostly remains the data controller for all of the training sessions organised by FPR under the control of the ECA's internal controller, including when the training is given by an external service provider, external trainer, EU institution, body, office or agency (**EUIBOA**). Each external party (data processor) acts under the ECA's instructions as controller. If the training is jointly organised with a third-party organiser (e.g. another EU institution or an external training provider), you will be informed about this in the invitation.

If the training takes place at the ECA but the trainers are from another EUIBOA, please note that the attendance list might be shared with that other EUIBOA for statistics purposes. In this controller-to-controller situation, the EUIBOA (which is a separate controller) with whom the ECA (as controller) shares the personal data, will become a personal data controller when they receive the attendance list.

## Why do we collect your personal data?

The FPR team and the training requester, if applicable, will use your personal data for the following purposes.

- To organise the training, to invite you and manage the list of registered participants (if applicable) in the EU Learn tool, or by other means (e.g. email).
- To enrol you in the Teams or Cisco Webex sessions (depending on the format of the training, e.g. hybrid, online).
- To provide you with the training material (if applicable), such as presentation slides, and answer your questions.
- To grant you access to our premises (if you attend the training in person as an external guest, please refer to the specific [data protection – privacy statement](#) for processing visitors' personal data at the ECA).
- To collect your feedback about the training. After the training, you may receive an invitation to participate in an anonymous survey. Your participation in this survey is entirely voluntary. The purpose of the survey is to continuously improve the quality of our training, ensuring that it is tailored to our audience. Professional Training will provide you with a specific data protection statement for the survey.
- For statistics (e.g. the number of participants). Only anonymous information will be processed.
- For historical archiving purposes in accordance with the ECA's historical archiving policies and procedures. Please refer to our [privacy statement](#) on the further processing of personal data for archiving purposes for further details.

Should there be any further intended processing for a purpose other than that for which the personal data has been collected, you will be provided with information about that other purpose and given any other relevant information required to ensure fair and transparent processing.

## What are the rules governing the use of your personal data?

The legal framework for the processing of personal data within the ECA is [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 EU institutions, bodies, offices and agencies and on the free movement of such data (the **EUDPR**).

The legal basis for processing your personal data to manage and organise your participation in training are as follows.

### For ECA staff only

- Pursuant to Article 5(1)(a) EUDPR, the processing of your personal data is necessary on the grounds of public interest. Knowledge gained through training enhances the performance of tasks, whether in audit or in one of the ECA's support functions.

- Pursuant to Article 5(b) EUDPR, the processing of your personal data is necessary for the ECA to comply with a legal obligation. See the [Staff Regulations of Officials of the European Union and other servants](#), and in particular Articles 24a, 45(2), 45a (1) b), 55a, and Article 6 of Annex V, implemented by internal [Decision No 71-2016](#) and amended by [Decision No 33-2022](#).
- Where applicable, the data processing is based on your consent when you register for training. You may withdraw your consent at any time. After the training, you may be able to share anonymous feedback if there is a survey. Your contribution would then be processed anonymously.

#### For external participants

- Pursuant to Article 5(1)(d) EUDPR, the processing of personal data is based on the consent given by the data subject for one or more specific purposes, including registration for the training. Consent may be withdrawn at any time.

#### For all participants (applicable to the processing of photos, voice, and video)

- Pursuant to Article 5(1)(d) of the EUDPR, the processing of personal data, including images or voice during training sessions and recorded videos, is based on the consent provided by the data subject. If consent is not granted for the use of image or voice as outlined in this data protection statement, participants should refrain from turning on their camera or microphone.

#### For external trainers

- Pursuant to Article 5(1)(d) of the EUDPR, the processing of personal data, including images or voice during training sessions and recorded videos, is based on the consent provided by the data subject.

The legal basis for further data processing for historical archiving purposes is [Council Regulation \(EEC, Euratom\) N° 354/83 of 1 February 1983](#), concerning opening the Historical Archives of the European Economic Community and the European Atomic Energy Community to the public, as amended.

The legal basis for further data processing for statistics is the same as for the legal bases detailed above, considering that any further processing of the data for statistical purposes is to be regarded as compatible with the initial processing<sup>1</sup>, i.e. no separate legal basis from that which allowed the collection of the personal data is required. However, in accordance with Article 13 of the EUDPR, the ECA will implement appropriate safeguards (such as pseudonymisation) on a case-by-case basis.

## What personal data do we process?

We will collect the following categories of data.

- Identification data from the registration form: name, surname, organisation, job, professional email address, professional phone number.
- Practical arrangements and correspondence.
- Budget: financial files and attendance sheets (as supporting documents).
- Consent form (if applicable): you agree or disagree to the publication of your name/job and photos/videos on the ECA's intranet and the ECA's social media.
- Should you choose to turn on your microphone and camera, your voice data, and your image data (if applicable) will be collected.

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<sup>1</sup> See recital 25 and Article 4(b) [EUDPR](#).

## How long do we keep your data?

Your personal data will be kept for as long as necessary for the purposes for which the personal data is processed. Thereafter, it will be erased or sent for permanent preservation.

### For all participants (ECA staff, ECA Members and other participants)

- Course administration: identification data (name, organisation, job, email address, professional phone number), practical arrangements and correspondence will be kept for 10 years after the end of the relevant financial year.
- Budget: financial files and attendance sheets will be kept as supporting documents for 10 years after the end of the relevant financial year.
- Supporting materials and recordings: photos, videos, webinar recordings and presentations will be kept for 10 years after the end of the relevant financial year. The most recent version will be selected and transferred to the archives for permanent preservation. They will be preserved with the corresponding consent forms. Photos and videos may also be web-archived.

### For external trainers (individuals, framework contract or interinstitutional)

- Course administration: identification data from the registration form (first name, last name, organisation, professional email address, professional phone number), CVs, practical arrangements and correspondence will be kept for 10 years after the end of the relevant financial year. Please note that your CV may also be archived.
- Budget: financial files will be kept for 10 years after the end of the relevant financial year.
- Supporting materials and recordings: photos, videos, webinar recordings and presentations will be kept for 10 years after the end of the relevant financial year. The most recent version will be selected and transferred to the archives for permanent preservation. They will be preserved with the corresponding consent forms. Photos and videos may also be web-archived.

Regarding all the training records data (training date, scores and grades, feedback from participants and certification) on the EU Learn platform, please refer to the specific [privacy policy](#). Please note that the European Commission operates this platform as a separate data controller and is responsible for the processing of your personal data on the platform.

## Who has access to your data and to whom will your data be disclosed?

Access to your data is limited to FPR and, if applicable, the training requester who has access to your personal data based on the “need to know” principle.

A limited amount of personal data is made available to trainers/presenters, providers of video conferencing tools (applicable only for online training), and other parties (Commission, external participants, etc., as detailed below).

### Trainers/presenters

In general, presenters or trainers will be able to process some of your personal data, but we make sure to limit what they can access. For example, they will see your name (online training) or your face (in-person and online training if you turn on your camera) during the training itself.

We will never share your email address with presenters or trainers, except if such data is necessary for them to organise the particular session or working group. If this is the case, we will inform you in the invitation and will make sure that the presenter or trainer signs specific data processing terms under which they agree to erase your email address once they have completed the task for which they were engaged.

## Providers of video conferencing tools

Please refer to the respective **data protection privacy statements** mentioned in the introduction (above) if Microsoft Teams or Cisco Webex are used. The ECA has implemented data processing agreements with these providers to ensure that a limited amount of data is processed when a specific event is held online.

## Commission (via EU Learn)

If EU Learn is the training enrolment registration tool, please refer to the privacy policy [here](#) to learn more about the processing of your personal data when using this platform. Some personal data required for the registration will be processed by the Commission as controller (for this processing activity only).

## Recording and sharing the recording of the training

The invitation will contain information on whether the training will be recorded and where the recorded material will be published, e.g.:

- the video may be made available on EU Learn to ECA staff. EU Learn is a platform provided by the Commission;
- the recorded material may be shared internally (e.g. on ECANet). This means that, subject to your consent, when you turn on your camera or microphone, your voice and image will be disclosed to any ECA member of staff; or
- the recorded material could be disclosed on ECAcademy (<https://ecademy.eca.europa.eu/>), a publicly available ECA platform.

## External participants

In the context of training that is open to external participants, the recorded material may be shared with external participants on request. These requests are carefully assessed before we grant access to the recorded material. Subject to your consent, when you turn on your camera or microphone, your voice and image will be disclosed to external participants.

## EUIBOA(s)

If the training takes place at the ECA but the trainers are from another EUIBOA, please note that the attendance list might be shared with the other EUIBOA: (i) to ensure that the number of participants does not exceed the maximum agreed number, (ii) for accounting purposes, and (ii) for statistics. The personal data included in the list might be pseudonymised or shared fully with the requesting EUIBOA using secure safeguards (e.g. encryption). We also remind the EUIBOA about the permitted scope of data use.

## Private companies

The attendance list may be shared with private companies<sup>2</sup> before the training takes place: (i) for organisational purposes (in particular when the training is online, to prepare the training session, or to send questions/case scenarios), (ii) to ensure that the number of participants does not exceed the maximum agreed number, and (iii) for accounting purposes. In such cases, the personal data included in the list may be pseudonymised or shared entirely with the requesting company using secure safeguards (e.g. encryption). We also remind external companies that they are not permitted to use ECA staff email addresses for promotional activities (e.g. promoting their services).

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<sup>2</sup> In this context, the ECA only shares the attendance list with private companies with which the ECA has a valid framework contract or cooperation agreement.

## European Union Institute (EUI) in Florence, Italy

If the training material is selected for historical archiving, the documents that make up the ECA's historical archives will be deposited at the Historical Archives of the European Union (HAEU), hosted by the European Union Institute (EUI) in Florence, Italy, which acts as data processor for the ECA (as controller). The ECA's historical archives will be opened to the public, free of charge, after 30 years have passed starting from their creation date.

## Other

Your personal data may be transferred to other recipients if you lodge a complaint with the European Ombudsman, the European Data Protection Supervisor, or the ECA Data Protection Officer.

## How do we safeguard against possible misuse of or unauthorised access to your data?

Data sets are securely stored in the ECA's data centre in the EU and are therefore covered by the numerous measures taken to protect the availability, integrity and confidentiality of the institution's electronic assets.

The ECA's Secretary-General has overall responsibility for implementing the rules on access rights and compliance with the rules on data protection, but has delegated responsibility in these areas to different entities. The ECA has an information security policy, and an Information Security Officer who ensures that the policy is correctly implemented and that the related checks are tested for efficiency.

### Sli.do (if used during the training)

To capture participants' attention and increase engagement and participation in the training, we may invite you to use Sli.do as a polling tool to ask a few questions (that participants can answer anonymously).

Sli.do is considered a data processor for the ECA, acting exclusively under the ECA's instructions (the ECA is the controller). The data in Sli.do is stored by AWS data centres in Ireland and Germany. In such cases, AWS acts as a sub-processor.

We have configured the Sli.do polls so that we cannot link users to their answers (unless users identify themselves when asking a question). The tool uses participants' identification information (unique identifier) solely to ensure the uniqueness of the reply and this information will only be kept for the duration of the Sli.do connection.

**If you choose to participate and you wish to protect your anonymity, please do not create an account with Sli.do.** Instead, use the access code supplied at the training and use the "vote as anonymous" function in Sli.do. Please also read the Sli.do [acceptable use policy](#), which applies to every participant.

### **Videoconferencing** (if used for the training)

During training, the measures in place to protect your personal data are detailed in the respective data protection statements:

- **Microsoft Teams** – please refer to the [specific privacy statement](#) on the ECA's M365 environment; and
- **Cisco Webex** – please refer to the [specific privacy statement](#).

## What are your rights?

Your rights in respect of your personal data are set out in Articles 17 to 24 of Regulation (EU) 2018/1725. You can find further details about your rights in this [document](#).

- You have the right to access your personal data, and to have it rectified without undue delay if it is inaccurate or incomplete.
- Under certain conditions, you have the right to ask us to erase your personal data, or to restrict its use. Where applicable and at any time, you have the right to object to the processing of your personal data on grounds relating to your particular situation, and the right to data portability.
- Where the processing of your personal data is based on your consent, you may withdraw that consent at any time, following which your personal data will be irrevocably removed from our records without undue delay and you will be informed, unless this deletion is prevented by a legal or contractual obligation. Please note that by turning on your camera, you are giving your explicit consent to be recorded during the training, as mentioned above. Withdrawing your consent to appear in the recording after the training may lead to difficulties or limitations in removing your data from the recording.
- When you participate in the training, you are not subject to any automated decisions (made solely by machines), e.g. profiling.

You can exercise your rights by contacting the data controller using the contact information below.

We will consider your request, take a decision and communicate it to you without undue delay, and in any event within 1 month of receipt of your request. This period may be extended by a further 2 months where necessary.

Please note that your rights may be restricted in accordance with [Decision 42-2021](#).

## Who should you contact if you have a query or complaint?

The first point of contact is the data controller: [ECA-formation@eca.europa.eu](mailto:ECA-formation@eca.europa.eu).

You may contact the ECA Data Protection Officer ([ECA-Data-Protection@eca.europa.eu](mailto:ECA-Data-Protection@eca.europa.eu)) at any time if you have any concerns or complaints about the processing of your personal data:

Data Protection Officer  
European Court of Auditors  
12 rue Alcide De Gasperi  
1615 Luxembourg  
LUXEMBOURG

You have the right to lodge a complaint, at any time, with the European Data Protection Supervisor ([edps@edps.europa.eu](mailto:edps@edps.europa.eu)) concerning the processing of your personal data.