



**Controller's Record of  
Personal Data Processing Activity**

<b>Item No.</b>		
1.	Name, department and e-mail address of Delegated Controller (author)	Joachim Schmelz <a href="mailto:WOL-DEPUTY-DIRECTOR-SECONDARY-CYCLE@eursc.eu">WOL-DEPUTY-DIRECTOR-SECONDARY-CYCLE@eursc.eu</a> Deputy Director of the secondary school
2.	Name, department and e-mail address of Joint Controller (if any) - attach arrangement between Joint Controllers	
<b>I. Processing Activity</b>		
3.	Name of processing	<b>Administration of the European Baccalaureate Exam</b>
4.	Description and purpose of processing	<p>The Baccalaureate Exam is administered to the S7 pupils each year for the purpose of determining whether the Baccalaureate will be awarded to each pupil. The process begins each school year in October when the S7 enroll in the Baccalaureate Exam and specify their choice of subjects.</p> <p>During the S7 year, pupils take a variety of exams and tests, the results of which are communicated to the pupils and their legal representatives. They are also assessed continuously by their subject teachers throughout the year and this teacher continuous assessment is recorded as an A mark. Written exam and test scripts are retained by the school for scrutiny by the pupils or legal representative's for periods set out in the implementational rules of the European Baccalaureate which are published for each annual session of the European Baccalaureate.</p> <p>The S7 educational advisors enter the continuous assessment marks and test results for their pupils in the BAC grade Viatic system, which automatically produces the final grade. Once entered in this system, the grade can be changed only by the Office of the Secretary General of the European Schools, and not by EEB2.</p> <p>The BAC reports are thereafter produced, and stored in the SMS.</p>
5.	Name and e-mail address of processor (sub-contractor)	
6.	Does the processing operation involve any automated decision-making/profiling?	<input checked="" type="checkbox"/> Automated: Grade reports generated by the Viatic system <input checked="" type="checkbox"/> Manual (not automated)
7.	Storage media	<input type="checkbox"/> Paper

		<input checked="" type="checkbox"/> Electronic
8.	Retention period	<p><i>Please suggest what you believe would be a reasonable retention period based on need and any applicable EU or Belgian legal obligations of which you are aware:</i></p> <input type="checkbox"/> ___ days <input type="checkbox"/> ___ weeks <input type="checkbox"/> ___ months <input type="checkbox"/> ___ years <input type="checkbox"/> other: The BAC reports/certificates are stored indefinitely, as they constitute proof of attainment of the European Baccalaureate and may be needed for the concerned pupil's lifetime.
<b>II. Legal basis</b>		
9.	Legal basis of processing	<input type="checkbox"/> Data subject's consent (attach blank consent form)(GDPR Art. 6(1)(a)) <input type="checkbox"/> Necessary for performance of contract (GDPR Art. 6(1)(b)) <input type="checkbox"/> Necessary for compliance with legal obligation (GDPR Art. 6(1)(c)) <input type="checkbox"/> Necessary to protect data subject's vital interests (GDPR Art. 6(1)(d)) <input checked="" type="checkbox"/> Necessary for performance of task carried out in the public interest or in controller's official authority (GDPR Art. 6(1)(e)) <input type="checkbox"/> Necessary for legitimate interests of controller or 3 <sup>rd</sup> party (GDPR Art. 6(1)(f))
<b>III. Data</b>		
10.	Categories of data subjects	<input type="checkbox"/> Pupils <= 16 yrs old <input checked="" type="checkbox"/> Pupils > 16 yrs old <input type="checkbox"/> Parents <input type="checkbox"/> PAS <input type="checkbox"/> Seconded staff (excluding teachers) <input type="checkbox"/> Seconded staff (teachers) <input type="checkbox"/> Locally recruited staff <input type="checkbox"/> Interim staff <input type="checkbox"/> (Successful) candidates (to a vacancy) <input type="checkbox"/> Unsuccessful candidates (to a vacancy) <input type="checkbox"/> Trainees <input type="checkbox"/> Vendors <input type="checkbox"/> Other (specify)
11.	Categories of personal data collected	<input checked="" type="checkbox"/> Name <input checked="" type="checkbox"/> Surname <input type="checkbox"/> Date of birth <input type="checkbox"/> City of birth <input type="checkbox"/> Country of birth <input type="checkbox"/> Nationality <input type="checkbox"/> Gender <input type="checkbox"/> Data concerning siblings <input type="checkbox"/> School email address <input type="checkbox"/> Personal email address <input type="checkbox"/> Professional email address <input type="checkbox"/> Professional phone number <input type="checkbox"/> Personal phone number <input type="checkbox"/> Home address <input type="checkbox"/> Picture <input checked="" type="checkbox"/> Student ID number <input type="checkbox"/> Parental marital status <input type="checkbox"/> Name of legal guardian (main custody of the child) <input type="checkbox"/> Salary or economic information

		<input checked="" type="checkbox"/> Other – written BAC exam scripts including B-test and pre-BAC written exam script, pre-BAC report and BAC report which contains summative marks for the BAC exam.
12.	Documents collected containing personal data	<input type="checkbox"/> Copy of passport <input type="checkbox"/> Copy of ID <input type="checkbox"/> Copy of transport document <input type="checkbox"/> Birth certificate <input type="checkbox"/> Marriage certificate <input type="checkbox"/> Document proving the exercise of parental authority <input type="checkbox"/> CV <input type="checkbox"/> Motivation letter <input type="checkbox"/> Application email of the candidate <input type="checkbox"/> Correspondence with the candidate <input type="checkbox"/> Declaration concerning the relevant professional experience <input type="checkbox"/> Declaration concerning allowances <input type="checkbox"/> Copy of relevant diploma <input type="checkbox"/> Reference letter <input type="checkbox"/> Work contract <input checked="" type="checkbox"/> Evaluation sheets
13.	Special categories of data	<p><i>Please specify type and justification for processing:</i></p> <p>1. Type:</p> <input checked="" type="checkbox"/> health data – documentation from a pupil’s physician may be needed to justify the need for provision of an accommodation of a pupil’s handicap during the Bac exam <input type="checkbox"/> data revealing religious/philosophical beliefs <input type="checkbox"/> data revealing trade union membership <input type="checkbox"/> data revealing racial or ethnic origin <input type="checkbox"/> data concerning a natural person's sex life or sexual orientation <input type="checkbox"/> data revealing political opinions <input type="checkbox"/> genetic data <input type="checkbox"/> biometric data for the purpose of uniquely identifying a natural person <input type="checkbox"/> data concerning criminal convictions and offences <p>2. Justification for processing:</p> <input checked="" type="checkbox"/> data subject's explicit consent <input type="checkbox"/> relates to personal data made public by the data subject <input checked="" type="checkbox"/> Processing necessary to meet obligations in field of employment, social security and social protection law <input type="checkbox"/> Processing necessary to protect data subject's or other natural person's vital interests where data subject incapable of giving consent <input type="checkbox"/> Processing necessary for establishment, exercise or defence of legal claims <input type="checkbox"/> Processing necessary for reasons of substantial public interest <input type="checkbox"/> Processing necessary for medical/health care <input type="checkbox"/> Processing necessary for public health <input type="checkbox"/> Processing necessary for archiving, research or statistics
<b>IV. Rights of Data Subjects</b>		
14.	Privacy statement (Information provided to the data subject)	<input checked="" type="checkbox"/> Data collected from data subject <input checked="" type="checkbox"/> Data not obtained from data subject
15.	Manner of providing the privacy statement to the data subjects (procedure to grant rights)	<p><i>Please suggest what you believe would be a reasonable way to provide the privacy statement, such as a reference in the first correspondence with the data subject to a link to the EEB2 website where the statement can be viewed.</i></p> <input type="checkbox"/> online <input type="checkbox"/> email <input type="checkbox"/> text (by phone number) Specify:

<b>V. Access and disclosure</b>		
16.	Recipients of the data	<i>Please specify any recipients outside of EEB2 that receive the data e.g. OSG, banks, travel agencies, etc.: OSG receives the data through Viatec, and has access to the records in SMS</i>
17.	Transfers to non-EU countries or international organisations	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If transfers are made, specify: Non-EU country to which transfers made _____  Basis of transfer: <input type="checkbox"/> Adequacy decision relating to recipient country (Andorra, Argentina, Canada (commercial organisations), Faroe Islands, Guernsey, Israel, Isle of Man, Jersey, New Zealand, Switzerland, Uruguay and the US (limited to the Privacy Shield framework) <input type="checkbox"/> Appropriate safeguards established <input type="checkbox"/> Derogation: <input type="checkbox"/> Data subject's explicit consent <input type="checkbox"/> Transfer necessary for performance of contract with data subject <input type="checkbox"/> Transfer necessary for performance of contract with other on data subject's behalf <input type="checkbox"/> Transfer necessary for important reasons of public interest <input type="checkbox"/> Transfer necessary for establishment, exercise or defence of legal claims <input type="checkbox"/> Transfer necessary to protect vital interests of data subject or others where data subject incapable of giving consent <input type="checkbox"/> Transfer of data from a public register
18.	Is a Data Protection Impact Assessment required?	<input type="checkbox"/> No <input checked="" type="checkbox"/> Yes, because the processing involves high risk of the following type: <input type="checkbox"/> Sensitive data or data of a highly personal nature <input type="checkbox"/> Data concerning vulnerable data subjects <input type="checkbox"/> Data processed on a large scale <input type="checkbox"/> Systematic monitoring <input checked="" type="checkbox"/> Evaluation or scoring <input type="checkbox"/> Innovative use or applying technological or organisational solutions <input type="checkbox"/> Automated decision making with legal or similar significant effects <input type="checkbox"/> Prevents data subject from exercising a right or using a service or a contract