



Schola Europaea

EEB2

Privacy statement for Pupil enrolment in school

1. Description and purpose of the processing operation

Enrolment process: Once the Central Enrolment Authority of the European Schools' Secretariat General allocates a pupil to EEB2, he/she is assigned to a language section and grade level by the enrolments secretariat. A paper file and an electronic file are created for each pupil.

Paper file: Once a pupil is enrolled at the EEB2, the application file (paper) is transformed to a paper pupil file. The pupil file is provided to the secretariat of the Deputy Head of nursery/primary or secondary, as appropriate, which maintains the file for the duration of the pupil's enrolment at EEB2. During the school year, any correspondence with pupils' legal representative (e.g. requests for absence, to change subject, or the need to repeat a year), information about change of family situation, all updates of information provided by pupils' legal representatives (e.g. the annual update of personal data concerning the pupil), and grade reports and Class Council notes concerning the pupil are added to the pupil file. Should a pupil's legal representative submit information relating to a learning disability of the pupil either during the application process or after enrolment, the enrolment secretariat immediately transmits such information to the Learning Support Coordinator, who places the information in the pupil's learning support file. Should a pupil's legal representative submit information relating to the pupil's health either during the application process or after enrolment, the enrolment secretariat immediately transmits such information to the school nurse, who places it in the pupil's medical file. At the end of each school year, the pupil's school report is added to the pupil's file. Once the pupil leaves the school or graduates, the pupil's file is archived.

Electronic file: The enrolments secretariat inputs certain data concerning pupils and pupil's legal representative from the pupil's paper file to create the pupil's electronic file in MySchool, within the School Management System (SMS). A paper form is sent with each pupil to their pupil's legal representative asking for any updates of their contact details and any change in the pupil's legal representative's employment contract with the EU institutions. When the pupil brings back the completed form, any updates are entered in MySchool by the enrolments secretariat and the paper form is placed in the pupil's paper file. If there is a change in the contract, the enrolments secretariat provides this information to the EEB2 colleagues responsible for financial administration. Pupils' legal representatives may also submit updates throughout the school year, which the enrolments secretariat enters immediately in MySchool. Once the pupil leaves the school or graduates, the pupil's date of departure is entered in the MySchool file and the pupil's file is deactivated automatically.

Official List of Pupils: Upon receipt from the CEA of the list of new pupils to be enrolled at EEB2, the enrolments secretariat compiles a comprehensive official pupils' list. The list is accessible electronically to authorized users in MySchool. A paper copy of the list is provided to responsible secretariats of EEB2 administration. The pupil list is updated with information on arrivals and departures of pupils whenever they occur. The enrolments secretariat informs responsible school services of such updates by email.

Statistical reports: EEB2 and OSG generate statistical reports (without personal data) about the pupils enrolled in EEB2 from the data entered in MySchool. Such data is used by the EEB2 administration or as required.

2. Legal basis for the processing

The legal basis for this processing operation is Article 6 paragraph (1)(e) (processing is necessary for the performance of a task carried out in the public interest or in the exercise of authority vested in the controller).

3. Categories of personal data collected

In order to carry out this processing operation, EEB2 collects the following categories of personal data: Name, surname, date of birth, city of birth, country of birth, nationality, gender, data concerning siblings, school email address, personal email address, professional email address, professional phone number, personal phone number, home address, photograph, marital status of pupil's legal representative, name of legal guardian, institution/employer of pupil's legal representative, type of employment contract of pupil's legal representative with EU institution. Copies of the following documents containing personal data are also collected: passport, ID, birth certificate, marriage certificate, document proving the exercise of parental authority, family court decision, adoption decision. The provision of this data is mandatory for the enrolment process.

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

EEB2 staff responsible for carrying out this processing operation has access to your personal data. In addition, the European Schools' Office of the Secretariat General (OSG) has unrestricted access to all of the data entered in MySchool. This data is often used by OSG to generate anonymous statistics about the pupil populations attending the European Schools (further details are provided in the OSG's record concerning the SMS).

Some of the data for each pupil in MySchool and paper copies of the Official List of Pupils are provided to the responsible APEEE school services to enable them to provide the services.

The list of EEB2 pupils is sent to the Belgian authorities, as required by Belgian law related to the obligation of children to attend school.

5. How do we protect and safeguard your personal data?

In order to protect your personal data, a number of technical and organisational measures have been put in place. Technical measures include appropriate actions to address online security, physical security, risk of data loss, alteration of data or unauthorised access, taking into consideration the risk presented by the processing and the nature of the data being processed. Organisational measures include restricting access to the data to authorised persons with a legitimate need to know for the purposes of this processing operation.

6. How long do we keep your personal data?

The documents in the pupils' paper file are retained for the duration of the pupil's enrolment at EEB2, if the pupil stays until receiving the BAC; if the pupil leaves EEB2 before the BAC, then the documents are retained until the pupil is 18 years old. Where possible, original documents are returned to the pupil's legal representative.

Exceptions:

- the school grade reports for S5 and S7, as well as the BAC, are retained indefinitely.
- the annual update of personal data concerning the pupil is retained until such update is received from the pupil's legal representative for the following year.

Electronic files are retained in accordance with the retention policy of the OSG concerning the SMS/My School.

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

You have the right to request access to your personal data, rectification or erasure of the data, or restriction of the processing of your data. You have the right to object to the processing of your data as well as the right to data portability. If the legal basis for processing is your consent, you have the right to withdraw your consent at any time. (The withdrawal of consent will not affect the lawfulness of the processing before the consent was withdrawn.) Any request to exercise one of these rights should be directed to the Controller (WOL-DP-CONTROLLER@eursc.eu).

You may contact the data protection officer (WOL-DPO-CORRESPONDENT@eursc.eu) with regard to all issues related to processing of your personal data and the exercise of your rights under Regulation (EU) 2016/679 or relevant Belgian national law.

8. Right of recourse

You have the right to have recourse to the Belgian Data Protection Authority (<https://www.autoriteprotectiondonnees.be/introduire-une-requ%C3%AAteune-plainte>) if you consider that your rights under Regulation (EU) 2016/679 or relevant Belgian national law have been infringed as a result of the processing of your personal data by EEB2.