
Privacy Policy



EUROPEAN AGENCY
for Special Needs and Inclusive Education

PRIVACY POLICY

European Agency for Special Needs and Inclusive Education



CONTENTS

EASNIE PRIVACY POLICY	3
Personal data protection principles	3
Your rights	4
Your obligations	4
Types of personal data EASNIE may hold	5
Collecting your personal data	6
Purposes of processing personal data	6
Sharing personal data with third parties	7
Securing personal data	7
Personal data retention	8
Revisions to the EASNIE Privacy Policy	8
Definitions	9



EASNIE PRIVACY POLICY

The European Agency for Special Needs and Inclusive Education (EASNIE) is committed to protecting the privacy, confidentiality and security of your [personal data](#).

As a data controller, EASNIE is responsible for deciding how it holds and uses your personal data and for notifying you of the information contained in this Privacy Policy.

This Privacy Policy describes:

- what personal data about you EASNIE collects and uses during and after your work relationship, and why and how it does so;
- with whom EASNIE might share this data;
- how long EASNIE keeps this data.

This is in accordance with the [General Data Protection Regulation](#) (GDPR). This Privacy Policy applies to all individuals working *with* and *for* EASNIE. Individuals working *with* EASNIE may include, but are not limited to, learners, families, experts and country representatives. Individuals working *for* EASNIE may include, but are not limited to, those who are contracted by it, such as team members and consultants.

It is important that you read and understand this policy. If you have questions or do not fully understand this policy, please ask EASNIE's Personal Data Protection Working Group (privacy@european-agency.org) for more information.

Personal data protection principles

EASNIE complies with the GDPR. This means that personal data EASNIE holds about you must be:

- used lawfully, fairly and transparently;
- collected only for valid purposes that EASNIE has clearly explained to you and not used in any way that is incompatible with those purposes;
- relevant to the purposes EASNIE has told you about and limited only to those purposes;
- accurate and kept up-to-date;
- kept only as long as necessary for the purposes EASNIE has told you about;
- kept securely.



Your rights

EASNIE will observe your legal rights regarding the personal data collected about you. These include your rights to:

- access your personal data;
- obtain information about how your personal data is stored;
- correct or have inaccurate personal data about you corrected;
- have your personal data securely removed or deleted when its retention is no longer necessary for the defined purposes;
- object to your personal data being processed;
- opt out of your personal data being shared with third parties;
- withdraw consent;
- request transfer of your personal data to another party.

You can exercise your rights by contacting privacy@european-agency.org if you wish to:

- review, verify, correct or request deletion of your personal data;
- object to the processing of your personal data;
- opt out of your personal data being shared with third parties;
- withdraw consent;
- make a complaint.

If you opt out of having your personal data shared with third-party providers or object to EASNIE processing your personal data, it may affect EASNIE's ability to perform its work relationship with you (such as paying you or providing a benefit) or prevent it from complying with its legal obligations.

If you have questions or concerns about the processing of your data or wish to exercise your rights under applicable law, contact privacy@european-agency.org.

Your obligations

EASNIE strives to maintain accurate, complete and up-to-date personal data (for example, private and/or work contact details). EASNIE relies on you to inform it of changes to your personal data.

If, during your work relationship with or for EASNIE, you come into possession of any personal data that is not strictly necessary for the performance of your tasks/services, you



must delete it immediately. In case of doubt, contact EASNIE's Personal Data Protection Working Group (privacy@european-agency.org).

'EASNIE Data Protection Code of Practice'

EASNIE strives to protect the data of everyone working for and with it. To do this, it commits itself to informing and educating those working for it about data protection issues, and to assisting them where necessary. The 'EASNIE Data Protection Code of Practice' is an internal document stating the steps that everyone working for EASNIE must take to ensure a high level of data protection. EASNIE will handle unintended violation of the 'EASNIE Data Protection Code of Practice' on a case-by-case basis, with a focus on avoiding similar incidents in the future.

Types of personal data EASNIE may hold

Depending on the circumstances of your work relationship/collaboration with EASNIE, the latter may collect, store and use personal data about you from one or more of the following categories:

- Contact details (including full name, address, mobile numbers, email addresses – both private and work-related)
- Personal data (including date of birth, gender, marital status, nationality, ID numbers and accessibility/dietary needs)
- Salary information (including payroll records, tax information and benefits information)
- Bank account details (for example, for fee payments or travel reimbursement)
- Employment records (including start date, workplace, job titles, work history, working hours, training records, holidays/leave, absences, contract details)
- Recruitment information (including curriculum vitae, references)
- Performance information
- Disciplinary and grievance information
- Work-related photographs, videos and audio recordings
- Emergency contact details
- Criminal record.

In limited circumstances and only when required by law, EASNIE may ask for your written consent to allow it to process '[special categories](#)' of more sensitive personal data. This could be data about health issues. In this case, EASNIE will give you full details of the information that it needs and why it needs it, so that you can carefully consider whether to give your consent.



Collecting your personal data

EASNIE may collect your personal data in several different ways. This includes from you directly or from another source where your personal data is publicly available.

In case of recruitment, EASNIE may also collect your personal data from an employment agency, employment business or from third parties, including your former employers (references).

Purposes of processing personal data

EASNIE processes personal data for the following general purposes:

- to identify people working with and for EASNIE;
- to communicate with people working with and for EASNIE;
- to comply with human resources requirements (for example, recruitment, employment, performance management, learning and development, payroll administration, compensation and benefits);
- to comply with legal regulations, including compliance with government authority requests for information and tax compliance;
- to support the work relationship with EASNIE;
- to comply with external/internal reporting and audit regulations.

EASNIE may sometimes need to process personal data for a purpose not originally considered at the time the data was collected. In these cases, EASNIE will notify you of this new use before processing your personal data.

Legal bases for processing personal data

EASNIE relies on the following legal bases for processing your personal data under the GDPR:

- General personal data: [Article 6 \(1\)](#)
- Sensitive personal data: [Article 9 \(2\)](#)
- Criminal record: [Article 10](#).



Sharing personal data with third parties

EASNIE may have to share your personal data with third parties. EASNIE requires third parties to respect the security of individuals' personal data and to treat it in accordance with the law.

EASNIE may share your personal data with third parties where required by law (for example, auditors, tax authorities, etc.), where it is necessary to administer the work relationship with people working with or for EASNIE or where EASNIE has another legitimate interest in doing so.

Third parties include third-party service providers. The following activities are carried out by third-party service providers: payroll, benefits provision and administration, information technology (IT) services, travel services and recruitment services.

All EASNIE's third-party service providers are contractually committed to take appropriate security measures to protect personal data in line with EASNIE policies. EASNIE does not allow its third-party service providers to use personal data for their own purposes. EASNIE only permits them to process personal data for specified purposes and in accordance with its instructions.

EASNIE may also share your personal data with third parties, such as hotels, restaurants, etc., related to your participation in EASNIE activities (for example, meetings and events). EASNIE will ask these third parties to document their GDPR compliance.

Securing personal data

EASNIE is committed to protecting the personal data it collects about you against the risks of loss or unauthorised use or access. It has implemented reasonable and appropriate technical, physical and administrative controls to protect your personal data.

In general, access to personal data is restricted to people working for EASNIE who need it for the purposes listed in this Privacy Policy or where otherwise required by law. This includes members of EASNIE's management, Human Resources and Financial Departments. Limited access may be granted on a strict need-to-know basis to other people working for EASNIE, such as to support your work with and for EASNIE and your participation in EASNIE activities, meetings, etc.

EASNIE may disclose personal data to protect the vital interests of people working with or for it (such as in response to a security incident or to medical workers in the event of a life-threatening emergency), to protect its legitimate interests (such as IT and network security) or if it judges the disclosure necessary to comply with applicable legal obligations.



EASNIE has procedures in place to deal with any suspected data security breach. EASNIE will notify you and any applicable regulator of a suspected breach where it is legally required to do so.

Personal data retention

EASNIE will only retain your personal data for as long as necessary to fulfil the purposes for which it was collected. This includes to satisfy any legal, accounting or reporting requirements. To determine the appropriate retention period for personal data, EASNIE considers:

- the amount, nature and sensitivity of the personal data;
- the potential risk of harm from unauthorised use or disclosure of personal data;
- the purposes for which personal data is processed and whether EASNIE can achieve those purposes by other means;
- the applicable legal requirements.

For the duration of your work relationship with or for EASNIE, your personal data will be processed in accordance with this Privacy Policy.

Once you are no longer working with or for EASNIE and it is no longer necessary to retain your personal data, EASNIE will securely destroy the data.

Revisions to the EASNIE Privacy Policy

EASNIE reserves the right to update this Privacy Policy at any time. EASNIE will not diminish your rights under this Privacy Policy or under applicable data protection laws in the jurisdictions in which EASNIE operates. If the changes to the Privacy Policy are significant, EASNIE will provide a more prominent notice when required to do so by applicable law. Please review this Privacy Policy from time to time to stay updated on any changes.



Definitions

Personal data

‘Personal data’ means any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person (Article 3 (1), [Regulation \(EU\) 2018/1725](#)).

Special categories of personal data

‘Special categories’ of personal data include sensitive data concerning racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data, data concerning health or data concerning a natural person’s sexual orientation (Article 9, [GDPR](#)).

