



DATA PROTECTION NOTICE for EUAA Trainers

1. Introduction

The European Union Agency for Asylum (hereinafter ‘the EUAA’ or ‘the Agency’) is committed to protecting your privacy. The EUAA collects and further processes personal data pursuant to [Regulation \(EU\) 2018/1725](#)¹ (hereinafter ‘the EUDPR’).

This Data Protection Notice explains *inter alia* the reasons for the processing of your personal data, the way we collect, handle and ensure protection of your personal data and what rights you have in relation to your personal data. It also specifies the contact details of the responsible Data Controller with whom you may exercise your rights, as well as of the Data Protection Officer (DPO) and the European Data Protection Supervisor (EDPS) to which you may have recourse as well to exercise the said rights.

2. Why and how do we process your personal data?

In line with the EUAA mandate, the EUAA deploys trainers from EU+ countries² to contribute to the implementation of its training, through the delivery of training sessions, including assessments, for learners and trainers.

Your personal data is processed for facilitating your selection and deployment as an EUAA trainer, the communication between you and the EUAA during the implementation of your activities, and for the evaluation after the training activities as an EUAA trainer. In addition, your personal data may be processed for the organization of thematic meetings.

The roles and responsibilities of trainers in EUAA training activities and the requirements for inclusion in the Training Pool are enshrined in the Decision of the Executive Director No 16/2024 on the terms of reference for experts in the EUAA’s Training Pool³.

Your personal data are collected through the Training National Contact Points who are responsible for collecting, at national level, and sharing with the EUAA nominations for trainers following a call for trainers launched by the EUAA.⁴

We process your personal data as follows:

- The collection of personal data is limited to what is directly and strictly relevant and necessary for the purpose of your selection, deployment, your access to the EUAA Learning Management System (LMS), the delivery of the training session(s) (including communication with your co-

¹ 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 Union institutions, bodies, offices and agencies and on the free movement of such data, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/EC, (OJ L 295, 21.11.2018, p. 39, ELI: <http://data.europa.eu/eli/reg/2018/1725/oj>).

² ‘EU+ countries’ refers to EU Member States plus Associated Countries.

³ EDD 16/2024 on the terms of reference for experts in the EUAA’s Training Pool.

⁴ In the case of third countries, personal data of trainers are collected through the EUAA International Cooperation Sector, in cooperation with focal points within the administrations of third countries.





trainer(s) and learners) and the generation of reports for planning and monitoring purposes, such as organisation of meetings, update of trainers' pool etc.

- Collection of personal data is also related to the trainers' performance, through evaluation surveys using a feedback form for training and assessment sessions, collected via the LMS, as well as the complaints procedure. Learner feedback is aggregated to the level of sessions to preserve anonymity. Feedback from evaluation surveys data is accessible by the assigned Trainers for a given session and by EUAA administrators with the aim of improving the overall quality of the service. This information is accessible via the trainer's LMS accounts. Detailed individualised feedback on satisfaction rates at the level of each session can be made available to the corresponding trainers upon request.
- In addition, your personal data may be processed for the purpose of organisation and participation in thematic meetings, targeting trainers.
- Furthermore, processing of personal data can take place for the purpose of identifying and updating national trainers' pools, as well as for seeking trainers' feedback on training needs at EUAA and national level

3. On what legal ground(s) do we process your personal data?

We process your personal data on the basis of Article 2(1) point (d) of [Regulation \(EU\) 2021/2303](#)⁵ (hereinafter 'the EUAA Regulation'), which provides that the Agency's tasks include: *"assist[ing] Member States as regards training and, where appropriate, provid[ing] training to Member States' experts from all national administrations, courts and tribunals, and national authorities responsible for asylum matters, including through the development of a European asylum curriculum"*.

More specifically, Article 8 of the EUAA Regulation provides, *inter alia*, that the Agency *"shall establish, develop and review training for members of its own staff and members of the staff of relevant administrations, courts and tribunals, and of national authorities responsible for asylum and reception"* and *"shall develop a European asylum curriculum [...] to promote best practices and high standards in the implementation of Union law on asylum"*, offering such high quality training *"with a view to ensuring greater convergence of administrative methods, decisions and legal practices, while fully respecting the independence of national courts and tribunals"*. As such, the processing is lawful under Article 5(1) point (a) of the EUDPR given that it is necessary for the performance of the tasks that the Agency has been vested with by virtue of its mandate.

Additionally, as long as you participate on a voluntary basis, we process your personal data on the basis of your consent. Consequently, this processing operation is also lawful under Article 5(1) point (d) of the EUDPR.

4. Which personal data do we collect and further process?

The following (categories of) personal data may be processed:

⁵ Regulation (EU) 2021/2303 of the European Parliament and of the Council of 15 December 2021 on the European Union Agency for Asylum and repealing Regulation (EU) No 439/2010, (OJ L 468, 30.12.2021, p. 1, ELI: <http://data.europa.eu/eli/reg/2021/2303/oj>).



- Credentials;
- First name and surname;
- Email address;
- Employing organisation or Institution and function/role;
- Qualifications;
- Certificates of attendance;
- Curriculum Vitae;
- Languages spoken;
- Record of training delivery (in terms of modules completed and delivered);
- Prior experience;
- Trainers' feedback on learners' assessment of results and grades;
- Learners' (anonymised) feedback on trainers' performance.

5. How long do we keep your personal data?

Your personal data are stored for as long as you comply with the Training Pool selection criteria, and you are available for deployment as an EUAA Trainer.

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

All personal data in electronic format (e-mails, documents, etc.) are stored on the servers of the EUAA. In order to protect your personal data, the EUAA has put in place a number of technical and organisational measures as required under Article 33 of the EUDPR. Technical measures include appropriate actions to address online 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 personal data being processed. Organisational measures include restricting access to the personal data solely to authorised persons with a legitimate need to know for the purposes of this processing operation.

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

The following (categories of) recipients have access to your personal data:

- Personnel of EUAA's Training and Professional Development Centre, who are in charge of: the trainer selection procedure; the management of the Training Pool; and of communication regarding your activities as trainer/assessor. Access is limited on a need-to-know basis depending on the specific task an actor has to perform each time;
- Co-trainers in the same training module(s)(as far as your , name, surname, contact details and profile on LMS are concerned);
- Authorised EUAA personnel acting as LMS administrators with access rights;
- Authorised EUAA personnel for the purpose of organisation and participation in thematic meetings or other training related activities, on a need-to-know basis.
- Authorised EUAA personal of the Training and Professional Development Centre handling training data for analytical and/or quality purposes.

In addition, Training National Contact Points may receive, upon request, information on the modules successfully completed by a trainer as well as the modules delivered.



8. Do we transfer any of your personal data to third countries or international organisations (outside the EU/EEA)?

In principle, no transfer of your personal data to third countries or international organisations (outside the EU/EUAA) will take place. To the extent that you may deliver training sessions to learners from (international) organisations⁶ and/or third country partners under the EUAA International Cooperation Frameworks⁷ this processing activity may entail transfers of personal data to (international) organisations or third countries.

For this purpose, in the absence of appropriate safeguards in place, the explicit and informed consent of the data subject(s) concerned is exceptionally sought.

9. Does this processing involve automated decision-making, including profiling?

This processing activity does not involve automated decision-making, including profiling.

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

According to the EUDPR, you are entitled to access your personal data and to rectify them in case the data is inaccurate or incomplete. If your personal data is no longer needed by the EUAA or if the processing operation is unlawful, you have the right to have your data erased. Under certain circumstances, such as if you contest the accuracy of the processed data or if you are not sure if your data are lawfully processed, you may ask the Data Controller to restrict the data processing. You may also object, on compelling legitimate grounds, to the processing of data relating to you. Additionally, you have the right to data portability which allows you to obtain the data that the Data Controller holds on you and to transfer them from one Data Controller to another. Where relevant and technically feasible, the EUAA will do this work for you.

If you wish to exercise your rights, please contact the Data Controller, i.e., Head of Training and Learning Management Unit, by sending an email to: training@euaa.europa.eu

You may always submit queries, remarks or complaints relating to the processing of your personal data to the Data Protection Officer (DPO) of the EUAA by using the following e-mail address: dpo@euaa.europa.eu.

In case of conflict, complaints can be addressed to the European Data Protection Supervisor (EDPS) using the following e-mail address: Supervision@edps.europa.eu

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⁶ Namely, the United Nations High Commissioner for Refugees (UNHCR), the International Organisation for Migration (IOM), the Council of Europe (CoE), the International Centre for Migration Policy Development (ICMPD), the Intergovernmental Consultations on Migration, Asylum and Refugees (IGC) and the General Directors of Immigration Services Conference (GDISC).

⁷ Notably, Albania, Bosnia and Herzegovina, Egypt, Kosovo, Montenegro, North Macedonia, Niger, Turkey, and Serbia.