



EUROPEAN EDUCATION AND CULTURE
EXECUTIVE AGENCY (EACEA)

EACEA.A – Erasmus+, EU Solidarity Corps
EACEA.A.5 – Youth, EU Solidarity Corps and Aid Volunteers

DiscoverEU

Data Protection Notice

This notice provides information on your rights in relation to data protection and on how your personal data are processed within the framework of DiscoverEU. All personal data are dealt with in accordance with Regulation (EU) No 2018/1725 on the protection of personal data by the Union institutions, bodies, offices and agencies¹ ("the Data Protection Regulation").

This notice outlines also the policies to collect, manage and use the personal data of the individuals concerned by DiscoverEU.

1. Who is responsible for processing your personal data (data controller)?

The European Commission (Directorate-General for Education, Youth, Sport and Culture (hereafter DG EAC) and the European Education and Culture Executive Agency (EACEA) act as joint controllers in relation to the DiscoverEU because they jointly process the personal data of the applicants submitting an application on the European Youth Portal to enable them to receive the DiscoverEU travel passes.

In this context, both DG EAC and EACEA will operate under a Joint Controllership Agreement (whose essence as required by the Data Protection Regulation can be found at [DiscoverEU | European Youth Portal](#)) and are committed to preserving the protection of your personal data.

The joint controller on the side of EACEA is the Head of Unit EACEA.A.5: Youth, EU Solidarity Corps and Aid Volunteers.

The joint controller on the side of DG EAC is the Head of Unit EAC.B.3: Youth and Volunteer Solidarity.

The joint controller can be contacted via the following email address: EACEA-DISCOVER-EU@ec.europa.eu.

2. Which personal data are processed?

The following personal data are processed:

2.1 Mandatory data for the below purposes:

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 Text with EEA relevance, OJ L 295, 21.11.2018, p. 39.

- identification data: first name, last name, date of birth, nationality, legal residence, personal identification numbers: ID card passport or legal residence number and issuing country (as well as copies of such document for the purpose of booking the travel and verifying the data during the booking by the contractor);
- physical characteristics of persons as well as their image (ID card/ passport/ or legal residence picture);
- contact details: email address and GSM/telephone number;
- information on career (previous and current occupation and envisaged future occupation: e.g. studies and employment).

2.2. Optional data:

- gender (if declared by the applicant), region of residence and military service;
- disability/ health situation (and related document proof) or visa related data (incl. reasons for refusal) when there is a request for special support by the applicant;
- personal data of people accompanying participants with special needs as stated above under 2.1;
- information on the data subject's family (level of education of the parents/legal guardians;
- (previous) involvement in a youth organisation;
- experience as a DiscoverEU Ambassador, insofar as personal data are disclosed (based on consent)
- allowances and bank account references (including if applicable IBAN/BIC code, means of payment (Paypal, Swift, etc) to fund the travel and source to finance non-covered costs.

3. For which purpose do we process your data?

- To organise selections, award, and delivery of DiscoverEU travel passes and related services (e.g. discount card), namely: launching selection rounds on the European Youth Portal managed by the EC/DG EAC inviting applicants to reply to a questionnaire. On this occasion, applicants have to submit certain personal data in order to allow the joint controllers and its contractor to assess if they meet the eligibility conditions. Participants are selected if they meet the eligibility conditions²;
- To book the travel (train, coach or plane tickets): The selected participants receive on their email address a notification on the results with a booking link and a unique hash code from the European Youth Portal, managed by DG EAC under [DPR-EC-00371](#). The participant clicks on the booking link, and it leads to the booking form of the contractor where the participant enters a unique hash code, received in the selection notification email, to book their travel and to provide the necessary data (first name, last name, date of birth, email address, phone number, postal code, ID issuing country, residence country, nationality, and if needed special needs). This is to verify the eligibility of the selected participants by the contractor by checking the validity of personal documents (proof of age, nationality or legal residence, etc.). After this, the travel pass and the accompanying discount card are awarded to participants by the contractor. Participants using the travel pass are in contact with the contractor to prepare their travel and in case they need support to use the travel pass, The persons assisting the participants in their trips are requested to provide their data for the travel booking purposes (as stated above under 2.1);
- To ensure monitoring and reporting by EACEA in order to issue aggregated data;

² Age, residence, if they didn't use the DiscoverEU travel pass before, if they fill their identity card (ID) or passport number or resident permit number in the online application form, if they agree with the Declaration on Honour of the application form

- To ensure provision of services related to special needs: for accessibility due to health-related reasons, for support to get visa if applicable, etc (by consent);
- To process possible reimbursement of costs incurred by the participants in exceptional cases e.g. for medical or visa expenditures;
- To allow sharing experience as DiscoverEU Ambassador for the selected applicants incl. via media based on the explicit consent of the data subjects;
- To organise pre-departure events or other events and be informed about EU initiatives by Erasmus+ National Agencies or Eurodesks Brussels Link (EBL), for data provided by DG EAC, or other (based on consent);
- To process all related consents for the selected applicants, i.e.:
 - to be contacted by the contractor and if applicable by its sub-processors for travel organisations as stated above,
 - to share your contact details with EU regions, Eurodesk and Erasmus+ National Agencies:
 - to be informed occasionally about European information of relevance to youth such as those under European Youth Portal (applicable to both selected and non-selected applicants),
 - to be contacted for media outlet coverage (print, TV, radio, or via Internet) selected by the European Commission (DG EAC). However, please note that you can always decline the request of a media outlet, even if consented earlier.
- To ensure monitoring and reporting by EACEA in order to issue aggregated data.

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

Access to your personal data may be given on a need-to know basis to the following authorised recipients, who fall under confidentiality duties:

- EACEA staff in charge of the process,
- Staff of the European Commission (DG EAC and DG DIGIT),
- Erasmus+ National Agencies (NAs) staff: DG EAC may provide limited access in the European Youth Portal to name, surname, e-mail addresses, telephone number, date of birth, country of selected participants to NAs to organise pre-departure meetings for the selected participants from their country) or for those on reserve lists to give them other information on EU related initiatives. In addition, NAs may be given the access to the reserve list DiscoverEU applicants' personal data (first name, family name, email address, telephone number, date of birth, country) for the purpose of sending event invites and information on EU initiatives (by consent),
- Eurodesk Brussels Link (EBL) staff: DG EAC shares the list of reserve list applicants to EBL (first name, family name, email address, telephone number, date of birth, country) for the purpose of events invites and information on EU initiatives (by consent),
- Staff of the contractor (Consortium with Eurail B.V. and MCI Benelux S.A.) and their authorised subcontractors (based in EU/EEA countries) acting under contract and its documented instructions. The contractor operates its DiscoverEU using services from the following tools and subcontractors:
 - Supabase (database)
 - Ebbot (chatbot)

- Flexmail (e-mail system)
- MessageBird (SMS system)
- Netigate (post-travel survey)
- Shufti Pro (ID verification)
- Adobe Campaign & Mandrill (e-mail confirmation)
- AWS Cognito & CommerceTools (account and order management)
- AWS Dynamo DB (travel pass)
- BizAway (travel management company)
- Insided (community)
- Mailchimp & IRIS/Intersystems (seat reservations)
- SQL Datawarehouse (archiving & reporting)
- Ating)Supabase (database)
- Unbabel (translations)
- Zendesk (helpdesk)
- Microsoft 365 (limited PPI)
- Adobe Sign (visa letters)
- ING (for reimbursement payments via wire transfer)
- Paypal (for reimbursement payments via Paypal)

- **Service Providers with their respective privacy statements**

- Caracal sprl (web agency)
- Eagle Travel (travel agency) - data privacy notice published at [PROTECTION OF PERSONAL DATA - Eagle Travel](#)
- IP Travel (travel agency) - data privacy notice published at [iptravel_data_privacy_protection.pdf](#)
- INS Global (travel insurance)
- Other booking platforms, such as national train railways or ferry companies
- Reservation carriers (Bene, Silverrail, Distribusion, Renfe, Trenitalia)
- BizAway (travel management company) - data privacy notice published at [Privacy & Cookies Policy - BizAway](#)

These travel agencies may process personal data in the context of booking and managing travel arrangements for a very limited number of cases (exceptional train, bus, ferry, or plane trips). While these travel agencies act in principle as sub processors for these services performed acting under the instructions of the contractor, they may also operate occasionally as independent data controllers, in particular when determining the purposes and means of processing related to ticketing, passenger records, payment processing, customer service, and compliance with transport regulations as regards the personal data requested.

In addition, in some limited cases the contractor may make direct bookings on the website of transport providers, such as specific bus or rail operators, or ferry companies. In these situations, the relevant transport provider acts as an independent data controller, processing personal data in accordance with its own privacy policy and legal obligations.

In this context, the Joint Controllers are not liable for any data protection issues occurring with those transport operators or travel agencies that act as independent data controllers, only the data mentioned in this data protection notice being processed by the contractor and the sub-processors. Depending on the itinerary requested by the participant, the travel agency may book trips with transport operators in countries in the EU/EEA or outside the EU/EEA but part of DiscoverEU initiative (North Macedonia, Serbia, Türkiye). Such trips are always booked upon request and based on the consent of the participant. Such transfer of personal data will be based on the derogation provided for in Article 50(1) (c) (transfer necessary to implement a contract concluded in the interest of the data subjects) of the Data Protection Regulation.

Your data may be transferred to third countries participating to the DiscoverEU initiative (see [DiscoverEU | European Youth Portal](#)) if you have requested to travel into those countries. This transfer will be based on:

- Adequacy decision of the European Commission;
- On derogations as per Article 50 of the Data Protection Regulation, namely:
 - explicit consent of the data subject(s),
 - transfer necessary to implement a contract concluded in the interest of the data subjects.

The information we collect will not be given to any third party, except to the extent and for the purpose we may be required to do so by law.

In addition, data may be disclosed to public authorities in accordance with Union and Member State law such as the European Court of Justice, the relevant national judge as well as the lawyers and the agents of the parties in case of legal proceedings, the Investigation and Disciplinary Office of the European Commission (IDOC), the competent Appointing Authority in case of a request or a complaint lodged under Articles 90 of the Staff Regulations, the European Anti-Fraud Office (OLAF), the Internal Audit Service of the Commission (IAS), the Court of Auditors, the European Ombudsman, the European Data Protection Supervisor (EDPS) and the European Public Prosecutor's Office (EPPO).

5. How long do we keep your personal data?

Personal data relating to non-selected applicants and non-booked participants for DiscoverEU will be deleted or anonymised maximum 2 years after the application deadline of the respective call for participation, unless they have consented to being informed about / involved in other European Youth Portal services in which case the data is kept for maximum 5 years from the application deadline of the respective call for participation. After that time, their personal data will be deleted or anonymised and only be kept for statistical purpose under aggregated data.

Personal data relating to selected and booked participants for DiscoverEU will be deleted or anonymised 5 years from the application deadline of the respective call for participation, unless the user has expressed his interest to withdraw from the 'selected user' status and has not benefited from EU funding through the initiative, in which case the data is kept for maximum 2 years after the application deadline of the respective call for participation.

However, we may keep anonymised information for a longer period for historical, statistical or scientific purposes with the appropriate safeguards in place.

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

Relevant organisational and technical measures are taken by EACEA and DG EAC to ensure the security of your personal data.

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 personal data solely to authorised persons with a legitimate need to know for the purposes of this processing operation. Access to your data is done via an authentication system on an individual basis through user-ID and password. Your data resides on the servers of the European Commission or relevant clouds, which abide by strict security measures implemented by the European Commission (DG DIGIT) to protect the security and integrity of the

relevant electronic assets. EACEA is bound by Commission Decision 2017/46 of 10/1/17 on the security of communications & information systems in the EC.

Contractors are bound by specific contractual clauses and requirements (e.g. confidentiality) for any processing operations of your data on behalf of EACEA, and by data protection obligations deriving from the application of the DPR and of the General Data Protection Regulation in the EU Member States ('GDPR' Regulation (EU) 2016/679). They are under contractual requirements to establish robust, reliable and secured systems to process data under DiscoverEU. The contractors have set up organisational and technical measures for ensuring confidentiality (incl. restricted access where applicable) and integrity of data based on the state of the art and to ensure secured dataflows and data management. They have a mitigation policy in place to address efficiently possible security incidents. Contractors are also bound by the European Commission's general security rules and standards and must take relevant Security Baseline measures.

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

Under the provisions of the data protection regulation, you have the right to request:

- to access the personal data EACEA/DG EAC holds about you;
- a rectification of your personal data where necessary;
- the erasure of your personal data, if applicable;
- the restriction of the processing of your personal data when applicable.

Considering the competitive nature of the selection process, the right to rectify information can only apply to the factual data processed within the concerned selection procedure. The right to rectify the data related to eligibility can only be exercised up to the closing date for submission of applications. However, inaccurate identification factual data may be rectified at any time during and after the award procedure.

When processing is based on your consent, you have the right to withdraw your consent at any time, without affecting the lawfulness of the processing before such a withdrawal. The withdrawal will have effect from the moment of your retraction. The processing based on your consent before this withdrawal will thus remain lawful.

As this processing of your personal data is based on point of Article 5(1)(a) of the Data Protection Regulation, please note that you have the right to object to processing of your personal data on grounds relating to your particular situation under the provisions of Article 23 of the Data Protection Regulation.

Article 25 of the Data Protection Regulation provides that, in matters relating to the operation of EU institutions and bodies, the latter can restrict certain rights of individuals in exceptional circumstances and with the safeguards laid down in that Regulation. Such restrictions are provided for in internal rules adopted by EACEA and published in the Official Journal of the European Union:

<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32021Q0317%2801%29>

Any such restriction will be limited in time, proportionate, and respect the essence of the above-mentioned rights. It will be lifted as soon as the circumstances justifying the restriction are no longer applicable. You will receive a more specific data protection notice when this period has passed.

As a general rule, you will be informed on the principal reasons for a restriction unless this information would cancel the effect of the restriction as such.

8. Contact Information

If you have questions or wish to exercise your rights under the Data Protection Regulation or if you want or to submit a complaint regarding the processing of your personal data, **you are invited to contact the Data Controller (see contact details above).**

You can also contact the Data Protection Officer of EACEA at the following email address: eacea-data-protection@ec.europa.eu.

You may lodge a complaint with the European Data Protection Supervisor at any time: <http://www.edps.europa.eu>.

9. On which legal basis are we processing your personal data?

We are processing your data on the basis of Article 5. 1 a) and d) of the Data Protection Regulation:

- Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Union institution or body (to be laid down in Union Law):
 - The Commission Implementing Decision 2021/173 establishing the EACEA,
 - The Commission Decision C(2021)951 and its annexes delegating powers to EACEA for the management of programmes in the MFF 2021-2027,
 - Regulation (EU) 2021/817 of the European Parliament and of the Council of 20 May 2021 establishing Erasmus+: the Union Programme for education and training, youth and sport and repealing Regulation (EU) No 1288/2013 (OJ L 189, 28.5.2021, p. 1–33) (Text with EEA relevance);
- The data subject has given consent to the processing of his or her personal data for one or more specific purposes stipulated here above.

Health data, related to special travel needs request, is processed under Article 10 of the Data Protection Regulation: the data subjects have given explicit consent to the processing for the specified purposes of enabling their traveling.