

Data Protection Notice

Processing of personal data for MOODLE e-learning platform

1. Introduction

This notice outlines the criteria by which the European Union Agency for Railways (ERA) collects and processes personal data in the context of the Moodle e-learning platform.

Your personal data are processed in accordance with [Regulation \(EU\) 2018/1725](#) of the European Parliament and of the Council of 23 October 2018 on the protection of individuals 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.

For more information about the processing in question, you are invited to contact ERA through the addresses provided in “Contacts” section.

2. Controller of the processing operation

The Controller determining the purpose and means of the processing of your personal data is the European Union Agency for Railways (ERA). The entity responsible for managing the personal data processing is the Head of Monitoring, Analysis, Research and Stakeholders Unit.

3. Purpose of the processing operation

The Agency is bound by its Regulation 2016/796 (Articles 39 and 43) to disseminate to stakeholders and engage in training related to the application of the EU railway law. To this purpose, the Moodle e-learning platform has been set up to facilitate ERA online training activities.

Specifically, personal data are processed to:

- > give full access to e-Learning contents;
- > support knowledge acquisition and reporting;
- > ensure correct training delivery.

4. Data Processed

- For guest (= anonymous users), no personal data is retained (access to limited contents).
- For registered users (= student profile):
 - the user database of the Agency (= SRMO) is used for logging into Moodle.

Therefore, the collected personal data are the following:

- AccountEnabled (defines if an account is enabled or not),

- AssignedLicenses (license Skuld),
- AssignedPlans (product),
- City (Valenciennes),
- CompanyName (European Union Agency for Railways),
- Country (France),
- Department (Unit),
- DisplayName (FirstName LastName),
- GivenName (FirstName),
- JobTitle (Title),
- Mail (email address),
- MailNickName (SAMAccountName),
- Mobile (mobile number),
- OnPremisesDistinguishedName (X.400 user ID)
- PhysicalDeliveryOfficeName (Office Number),
- PostalCode (59300),
- ProxyAddresses (X.500 and SMTP mail addresses),
- SipProxyAddress (same attribute as email address),
- State (Nord),
- StreetAddress (120, rue Marc Lefrancq)
- Surname (LastName),
- TelephoneNumber (Landline number),
- ThumbnailPhoto (Picture),
- UsageLocation (FR),
- UserPrincipalName (The UPN is the login ID for the user and equivalent to the email address).

The final certificate, if applicable, consists of an attendance proof.

All personal data are processed only by designated staff and stored on Microsoft cloud servers located in Europe, which abide by the ERA's IT security rules and standards, pursuant to the Commission Decision (EU, Euratom) 2017/46 of 10 January 2017 on the security of communication and information systems in the European Commission.

The users training logs are stored in Eduano's servers (EU based), following the [SaaS questionnaire](#) signed as part of the FWC DI 07722.

5. Recipients of personal data

1. Authorised Agency staff dealing with the Moodle platform.
2. Microsoft's personnel managing the databases on Microsoft cloud servers and their sub-processors' personnel on a need-to-know basis.

All recipients of the data are reminded of their obligation not to use the data for any further purpose other than the ones for which they were collected.

Transfers of personal data outside the European Union are not foreseen.

However, diagnostic data covered by contractual rules may be sent to Microsoft outside EU territory.

Microsoft commits to have in place written agreements with all sub-processors that are at least as restrictive in terms of data protection and security as their data processing agreement with the EC.

The activities of all sub-processors are in scope of third-party audits.

6. Your Rights as data subject

You have the **right to access** your personal data, which is the right to obtain confirmation about your data processed by the Agency and the **right to ask for the correction** of any inaccurate or incomplete personal data.

You have also the **right to object to the processing or request the erasure** of your personal data, which will be implemented as soon as your specific request will have been deemed legitimate.

If you have any queries concerning the processing of your personal data, you may address them to the data Controller. You will find the address in the Contacts below.

7. Legal basis for the processing operation

Legal basis: Moodle e-learning platform supports training activities which have to be undertaken by the Agency in the context of Articles 39 and 43 of Regulation ([EU 2016/796](#)) of the European Parliament and of the Council of 11 May 2016 on the European Union Agency for Railways.

Lawfulness:

The above data processing operation is carried out in accordance with Art. 5(1)(a) of Regulation (EU) 2018/1725:

a) 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;

8. Time limit for storing the data

For ERA internal users:

As long as the relationship between the Agency and the Data Subject exists.

For external users:

As long as users are recorded as active.

9. Contacts

All your requests concerning your data protection rights should be addressed to the Data Controller the Head of Analysis Unit at AOD.mars@era.europa.eu.

In case you have any questions related to the protection of your personal data, you can also contact the ERA Data Protection Officer at DataProtectionOfficer@era.europa.eu.

You have at any time the right of recourse to the European Data Protection Supervisor at edps@edps.europa.eu.