

## Record of processing activity

01 - Name of processing	Moodle-eLearning platform
02 - Reference	108
03 - Submission Date	10/07/2023
04 - Last update	10/07/2023
05a - Controller	GIGANTINO Anna
05b - Unit-Sector	Monitoring, Analysis, Research and Stakeholders Unit
05c - Controller's email	aod.mars@era.europa.eu
06 - DPO	DataProtectionOfficer@era.europa.eu [mailto:DataProtectionOfficer@era.europa.eu] 120 Rue Marc Lefrancq, 59300 Valenciennes, France Tel. +33 (0) 32 70 96 500
07 - Name and contact details of joint controller(where applicable)	N/A
08a - Who is actually conducting the processing?(Article 31.1(a))	The data is processed by ERA (responsible unit) itself
08b - Name and contact details of processor (where applicable)	N/A
09 - Purpose of processing	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 eLearning content; * support knowledge acquisition and reporting; * ensure correct training delivery.
10a - Data Subjects	Any individual interested in ERA's training registered as ERA user or not (guest profile).
10b - Personal data	- For guest (= anonymous users), no personal data is retained. - For registered users (= student profile): * The user database of the agency (= SRMO) is used for logging into Moodle. See record #74 [/sites/DPO/Lists/Records/DispForm.aspx?ID=77&pa=1&e=3bTdlO]. * The final certificate, if applicable, consists in an attendance proof.

11 - Time limit for keeping the data	Based on record #74 [/ <a href="#">sites/DPO/Lists/Records/DispForm.aspx?ID=77&amp;pa=1&amp;e=S2g7QA</a> ]: 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.
12 - Recipients of the data	The recipients of the personal data are: * Authorised Agency staff dealing with Moodle. * 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. The personal information collected will not be communicated to third parties.
13 - Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards?	Not applicable.
14 - How is data stored? What are the security measures implemented?	- The users accounts follow register notification #74 [/ <a href="#">sites/DPO/Lists/Records/DispForm.aspx?ID=77&amp;pa=1&amp;e=6af1r6</a> ]. - The users training logs are stored in Eduano's servers (EU based), following the SaaS questionnaire [/ <a href="#">b:/r/sites/CPT/IC2022/ITFM-OF%200210174240%20%20-%20MOODLE%20FIREWALL%20-%20SAAS/I%20GeSLA_Annex%202_SaaS%20questionnaire_Moodle_2022.pdf?csf=1&amp;web=1&amp;e=mpfjEM</a> ] signed as part of the FWC DI 07722.
15 - For more information, including how to exercise your rights to access, rectification, object and data portability (where applicable) see the data protection notice	End-users are informed about the data processing via data protection notice attached to the present notification and published on the Agency website.
15a - Data subject rights	Right to have access
16 - Legal Basis	Agency Regulation (EU) 2016/796
17 - Lawfulness of processing	Article 5 a) of Regulation (EU) 2018/1725
18 - Data minimisation	The user database of the agency (= SRMO) is used for logging into Moodle. See record #74 [/ <a href="#">sites/DPO/Lists/Records/DispForm.aspx?ID=77&amp;pa=1&amp;e=3bTdlO</a> ].
19 - Accuracy	All the information related to the data subjects are checked and validated against the user accounts notation (see record #74 [/ <a href="#">sites/DPO/Lists/Records/DispForm.aspx?ID=77&amp;pa=1&amp;e=3bTdlO</a> ]).

20 -Threshold assessment, fill in the specific Threshold assessment-Risks entry in sharepoint.	N/A
21 - Special category data	NA
22 - DPIA	NA
23 - Link to the Threshold assessment-Risks	N/A
24 - Other related documents	N/A