

## Record of processing activity

## **EBA Learning Hub**

Record of EBA activities processing personal data, based on Article 31 of Regulation (EU) 2018/1725 (EUDPR)

Nr	Item	Description
Part	1 - Article 31 Record (publicly a	vailable)
1	Last update of this record	11/08/2023
2	Reference number	EBA/DPR/2023/9
3	Name and contact details of controller	Controller: European Banking Authority, Tour Europlaza, 20 avenue André Prothin, CS 30154, 92927 Paris La Défense CEDEX, France
		Responsible department: Governance and External Affairs
		Contact: EBA-Learninghub@eba.europa.eu
4	Name and contact details of DPO	dpo@eba.europa.eu
		you can also send a letter to the postal address of the EBA (above address) marked for the attention of the DPO of the EBA
5	Name and contact details of joint controller (where applicable)	N/A
6	Name and contact details of processor (where applicable)	Litmos  SAP Belgium S.A./N.V. Avenue des Olympiades 2 Olympiadenlaan Brussels, 1140 Belgium VAT N° BE0441.797.980 RPR/RPM Brussel-Bruxelles https://www.litmos.com/privacy-policy
7	Short description and purpose of the processing	The EBA is using the Learning Hub as a Learning Management System to plan, organise, manage, and evaluate training actions and learning opportunities for staff members of the EBA and for members from National Competent Authorities and other public bodies. We collect our users' identification data for the purpose of

Nr	Item	Description
		creating user accounts. The data is stored inside the training platform for as long as the user keeps the account. The data is stored in the cloud. The security of the training platform is managed by Litmos.
8	Description of categories of persons whose data the EBA processes and list of data categories	The following categories of persons can be concerned by this processing operation:
		EBA Staff (Temporary Agents, Contract Agents)
		Seconded National Experts
		• Trainees
		<ul> <li>Participants from EU National Competent Authorities and other public bodies</li> </ul>
		<ul> <li>Agreed participants from other bodies from third countries</li> </ul>
		Categories of data processed for the account management:
		• Names
		Email addresses
		<ul> <li>Organisation of employment</li> </ul>
		Job title
		Categories of data processed within the platform:
		<ul> <li>User data (see account management above)</li> </ul>
		<ul> <li>Data related to the enrolment in training sessions</li> </ul>
		<ul> <li>Status of the training and results of tests</li> </ul>
		<ul> <li>Course data and statistics related to the training sessions</li> </ul>
		Feedback on the training session
9	Time limit for keeping the data	The data is retained for as long as the user keeps the account active and no longer. All data are deleted automatically when the user account is deleted. The deletion is manually enacted when the EBA staff members, Seconded National Experts and Trainees leave the EBA within up to 3 months, or up on specific request for the other categories of participants.
10	Recipients of the data	The personal data related to the accounts and training can be accessed internally in the EBA by the platform Administrators.
		Team administrators or team leaders who were granted augmented rights to administer certain aspects of the platform) have access to limited personal data consisting mainly of statistic data, usage data, trouble shouting data.

Nr	Item	Description
		Likewise, staff of Litmos (technical support staff) can access the platform including user data and platform data to perform their duties. Those include:
		- Technical support
		- Executing patches and fixes
		- Ensure the correct functioning of the platform
11	Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards?	No
12	General description of security measures, where possible	Processing of personal data in the context of this processing activity is performed under the EBA Information Security  Framework, published on the EBA intranet. The security of the training platform is managed by Litmos
13	For more information, including how to exercise your rights to access, rectification, object and data portability (where applicable), see the data protection notice:	The Data Protection Notice available on the platform