



Dear Parents/Legal Representatives,

The European Schools are a *sui generis* intergovernmental organization. Their aim is to provide children with high-quality education and learning, in the public interest.

The *eTwinning* action is part of the Erasmus+ programme and promotes school cooperation in Europe through information and communication technologies (ICT). The multilingual eTwinning platform serves as the central meeting point and workspace for the initiative.

The *eTwinning* action is open to all schools (from primary to general, vocational, or technical secondary education, as well as special education), teachers of all subjects, school heads, and non-teaching educational staff.

To participate in *eTwinning*, the teacher will register your child on the European portal – www.etwinning.net. Once registered, the teacher and students will have access to a personalized workspace and the tools of the *eTwinning* platform.

Once the project is approved, this provides access to a secure space, the TwinSpace, which allows users to manage the project, share files (text, images, videos, presentations, etc.), and communicate with project members (chat, internal messaging, forum). Teachers may also grant access to this space to students, as mentioned above, to other partners, and even to visitors (parents, inspectors, or school heads).

Under Regulation (EU) 2016/679 of 27 April 2016 of the European Parliament on the protection of natural persons with regard to the processing of personal data — the **General Data Protection Regulation (GDPR)** — the European School of Luxembourg II is required to process a certain amount of personal data.

In order to respect your privacy and comply with data protection legislation (including the GDPR), your consent is required to authorize the European School of Luxembourg II to register your child on the eTwinning platform as part of educational projects and, where applicable, to share photographs and/or video recordings in which your child may appear.

The European School of Luxembourg II (hereinafter referred to as “the School”) undertakes to respect your privacy and to comply with the requirements of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (hereinafter referred to as the “GDPR”).

This Privacy Notice informs you about how the School processes the personal data collected as part of this activity. It describes the types of personal data that the School may collect, explains why the School processes this personal data, with whom it is shared, and specifies your rights regarding the personal data collected.



1. Request of consent

To facilitate the collection of consent, the European School of Luxembourg II has set up an electronic form, Microsoft Forms, entitled “20xx-20xx - eTwinning -Parental Consent for pupil participation to [name of the project]¹”.

You must complete it if you authorize, or not, your child, or yourself, if you are an adult student (aged eighteen (18) or over), to participate in this/these educational project(s).

2. Data collected through the consent form

Personal data collected are as follows:

- Student: Last name(s); First name(s); Class
- Parents/Legal Representatives: Last name(s); First name(s)

The teacher in charge of the project will have access to this personal data.

3. Data entered on the eTwinning platform

1) Account creation

Your consent will authorize the school to share your child’s data with *eTwinning*, to register them, and to create your child’s profile on the platform.

This action will be carried out by the teacher responsible for the project.

Data provided: Last name, first name, and date of birth. From level P4 onwards, the student’s email address, provided by the school, will also be included to enable the teacher to grant them access.

2) Depending on the projects

Depending on the projects, additional personal data relating to your child may be provided. This may include, in particular, photographs and/or video recordings in which your child may appear.

4. Purposes of data processing

The European School of Luxembourg II aims to provide children with high-quality education and learning, in the public interest.

¹ The school year and the name of the project will be specified for each new initiative.



The School will use the personal data collected about students and their parents/legal representatives for the following purposes:

- Management of consents ;
- Management of account creation on the *eTwinning* platform;
- Project management.

5. Legal basis

As stated above, the purpose of the European School of Luxembourg II is to provide students with high-quality education and learning, in the public interest.

Within the framework of the *eTwinning* action, the processing of students' personal data will be carried out solely on the basis of consent from the parents/legal representatives if the student is a minor, or from the student themselves if they are an adult (aged eighteen (18) or over).

6. Data storage

1) Consent form

Storage within the European Union.

In the case of an electronic form using "Microsoft Forms", the data provided will be stored in O365 (see Article 4, point "a", paragraph 2 of our Privacy Notice; link: [European School Luxembourg II Privacy Statement](#))

2) eTwinning

The **Directorate-General for Informatics of the European Commission** (DG DIGIT) provides the hosting service for the European School Education Platform, including the *eTwinning* space.

The platform's servers are hosted on Amazon Web Services (AWS) in European data centres. DG DIGIT manages the cloud infrastructure in a highly secure environment. Only authorized personnel have access to the data storage media in the data centres, and these facilities are subject to strict physical security measures.

7. Durée de conservation

1) Consent form

For organizational reasons, your choices will be retained throughout the school year.

2) eTwinning platform

User profile data is retained for a maximum of three (3) years after the user's last login. After one (1) year from the last login, the profile will automatically be considered inactive, meaning it will no longer be visible to other users.

To deactivate or delete an account, you may contact the central helpdesk at the following address: privacy@esep-support.eu

8. Exercising your rights

With regard to the processing of your personal data, you have the right to information and the right to access your personal data. You also have the right to rectification, the right to erasure of your data, and the right to object to its processing.

When the School processes personal data based on your consent, this consent may be withdrawn at any time. The withdrawal of consent does not affect the lawfulness of processing carried out based on consent before its withdrawal.

To facilitate the exercise of your rights, you may submit your request to our Data Protection Officer by email at the following address: MAM-DPO-CORRESPONDENT@eursc.eu

9. Who should you contact in case of a complaint?

If you consider that the School does not comply with applicable data protection laws (in particular the GDPR) or that your rights have been violated in the processing of your personal data, you have the right to lodge a complaint and you may contact the "Commission nationale pour la protection des données" (CNPd) (www.cnpd.lu).

10. Additional information

We also invite you to consult the following information:

- a) [European School Luxembourg II Privacy Statement](#)
- b) [Links to eTwinning](#)



Schola Europaea Luxembourg II

Privacy policy:

eTwinning

1. Website: <https://school-education.ec.europa.eu/en/etwinning>
2. Privacy policy: https://school-education.ec.europa.eu/en/etwinning_privacy_policy
3. Privacy policy for Registered Users: <https://school-education.ec.europa.eu/en/privacy-policy>

c) ANEFORÉ

Luxembourg's ANEFORÉ is the national agency responsible for implementing European lifelong education and training programmes. This agency is in charge of *eTwinning* in the Grand Duchy of Luxembourg (<https://www.anefore.lu/>). ANEFORÉ page dedicated to à *eTwinning* (<https://www.anefore.lu/etwinning/>).

For any specific questions and/or additional information regarding *eTwinning*, you may contact them by email at the following address: info@anefore.lu