European Union Agency
for Cybersecurity

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TRAINING OF STAFF

Record of processing activity

Title	Training of staff
Name and contact details of controller	ENISA, Corporate Support Services Unit (HR) and ISO (for security awareness training), HR-general@enisa.europa.eu
Name and contact details of DPO	dataprotection@enisa.europa.eu
Name and contact details of Joint Controller	European Commission, EU Learn platform: Learning and development platform,HR-EU-LEARN@ec.europa.eu (for some trainings). For further information:https://webgate.ec.europa.eu/ilp/pages/external-dashboard.jsf?dashboardId=805652 EC DPO:DATA-PROTECTION-OFFICER@ec.europa.eu
Name and contact details of processor	1) Further inductors/contractors/education centers within EU that ENISA (or EU-Learn) employs for the provision of trainings, such as Deloitte, EIPA, Accenture, Abilways etc. 2)Knowbe4 Inc., based in US, only for the provision of an online service for security awareness training for registered ENISA staff (under the supervision of ENISA's ISO). The service has been purchased under the European Commission DG DIGIT FWC SIDE II. ENISA has signed the EC SCCs with the processor for the transfer of personal data to US.
Purpose of the processing	To plan and organise training activities for ENISA staff; to manage the training budget; to keep record of training received by ENISA staff.
Description of data subjects	Staff members that request an external training within the ENISA policy framework for training on individual initiative in the interest of the service, e.g. Temporary agents and Contract agents, as per ENISA"s Decision MB/2018/9 on learning and development.
Description of data categories	1) General (ENISA HR): Name; date of entry into service; probationary period end date; unit; grade; work phone number; course foreseen in appraisal report, course details (title, location, duration, fees, etc). 2) Specific for the security awareness training platform (processor KnowBe4): name, email address, telephone number, security awareness training and simulated phising campaings results and metrics, IP address, web browser information.
Time limits (for the erasure of data)	Personal data are processed by ENISA's HR for up to 5 years after the end of a service or contract with service providers. For the security awareness training platform (processor KnowBe4): the processor will delete all data at any time upon request of ENISA or at the end of the contract (apart from data included in audit trails and back-up systems which will be maintained under the terms and condictions of the EC SCCs signed between ENISA and the processor).
Data recipients	Designated ENISA staff in Human resources (Learning and Development Coordinator and HoHR), Management (line manager of staff member and Head of RD). Designated staff of joint controller. Trainers (processors) providing the training course, for example trainers of the EU Learn tool may also have access to the name of the staff member participating in the course.

	For the security awareness training platform (processor KnowBe4), recipients include: designated ENISA staff organising the trainings; staff of the processor and its subprocessors, in US.
Transfers to third countries	Regarding the security awareness training platform (processor KnowBe4): The processor is based in US. Transfers of personal data by ENISA to the processor are based on EC SCCs singned between ENISA and KnowBe4. The processor has executed EC SSCs with all its subprocessors inolved in the processing (subprocesors are explictly listed as an Annex to the EC SCCs between ENISA and the processor).
Security measures - General description	General security policy and technical/organisational measures for ENISA's internal IT systems.Access to data is granted to designated ENISA staff members in line with their job profile and only to data relevant to carry out their tasks. Security measures of EU-Learn platform. Regarding security awareness training (processor KnowBe4): security measures as set out in Annex to the SCCs signed between ENISA and processor.
Privacy statement	ENISA privacy statement available on intranet for all ENISA staff; EU-Learn privacy policy available on the EU Learn site.