Records of data processing activity

Name and reference number of processing operation: **EU NTC Learning Management System**, TDT-013

1.	Last update of this record, version number:	31/03/2025. Version 1.
2.	Reference number:	TDT-013
3.	Name and contact details of controller:	Controller: European Medicines Agency, Contact: Head of Digital Transformation Task Force, EMA datacontrollertdt@ema.europa.eu
4.	Name and contact details of DPO:	dataprotection@ema.europa.eu
5.	Name and contact details of joint controller (where applicable)	N/A
6.	Name and contact details of processor (where applicable)	EMA Talent Hub, an SAP platform (SucessFactors) that used cloud-based modules. Contact: privacy@sap.com
7.	Purpose of the processing	To streamline educational processes in the context of performing of the Agency tasks regarding the EU Network Training Centre. • Specifically: Collecting personal data, such as names, email addresses and NCA and when registering for courses. • Storing data of user information, course progress and completion statuses for course and user tracking as well as for organising synchronous trainings. • Managing user accounts: creating, updating and deleting profiles. • Communicating with users: sending notifications, updates, and feedback, via email.

		• Generating reports on user performance, course completion rates and other analytics. • Technical information for auditing and security purposes.
8.	Description of categories of persons whose data EMA processes and list of data categories	Apart from any member of the EMA Staff with access to talent hub, every staff member from National Competent authorities who voluntary joins to access a learning resource. No special categories of personal data are stored. Specifically, the stored data is: - Provided by the user: user id, full name, email, job location (NCA), job role and area of interest. - Generated by user activity: course enrolled, date of enrolment, progression of the course, date of course completion. - Technical data: some technical data is stored by the processor (ip or user agent), for security purposes.
9.	Time limit for keeping the data	Data is stored for as long as the user remains active in the platform. Any records produced will remain stored for three years after an account is deactivated and will be deleted automatically thereafter.
10.	Recipients of the data	The data collected will be processed internally by staff within the EMA Digital Transformation Taskforce, namely the EU NTC core team. Records might be accessed for specific technical purposes by SAP consultants or others system administrators. Technical data like IP or user agent is stored by SucessFactor (data processor) for security purposes. Statistical and aggregated data may be published on the EMA corporate website as well as other internal presentations. Specific records of attendees will be shared with course organisers in the context of specific webinars or courses. NCA local administrators in the context of their own NCA can access to records of course completion and registration.
11.	Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards?	In certain situations, user data may need to be shared with third parties outside the European Union (EU) for the purpose of providing support related to specific issues or technical assistance. This transfer will only occur after obtaining prior approval from the user. In general, this approval will be required before sharing any data with the third party. However, in cases of very high urgency, such approval may be granted without delay, but only under exceptional circumstances. We ensure that any such transfers are done in compliance with applicable data protection laws, and appropriate safeguards are in place to protect your personal data.
12.	General description of security measures, where possible.	All the data is cloud stored at the LMS. Data can only be accessed by users granted the administrator role. Downloaded data for analysis will only be stored in secured servers and promptly anonymised. Specific data for course organisers or for other specific courses will be shared using secured methods or encryptions.

13.	For more information, including how to exercise your rights to access, rectification, object and data portability (where applicable), see the privacy statement:	https://www.ema.europa.eu/en/about-us/data-protection-privacy-ema