

RECORD NO: 18

# TRAINING OF STAFF

## Record 18 of processing operation “Training of staff”

Date of last update	08/04/2025
Name and contact details of controller	ENISA, Corporate Support Services Unit (HR), <a href="mailto:hr-general@enisa.europa.eu">hr-general [at] enisa.europa.eu</a> ,
Name and contact details of DPO	<a href="mailto:dataprotection@enisa.europa.eu">dataprotection [at] enisa.europa.eu</a>
Name and contact details of Joint Controller	Based on the type of training, the joint controller may be European Commission, EU Learn platform: Learning and development platform, <a href="mailto:HR-EU-LEARN@ec.europa.eu">HR-EU-LEARN [at] ec.europa.eu</a> (for trainings offered through the EU Learn Platform).
Name and contact details of processor	Based on the type of training, the processor maybe one of the following: <ul style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>Academy to Innovate HR (AIHR) based in the Netherlands, under a contract with ENISA.</li> </ul>
Purpose of the processing	The purpose of processing concerns the planning and organisation of training activities/sessions for ENISA staff and to keep track of trainings received by ENISA staff.
Description of data subjects	Staff members that request or a subject to receiving a training in accordance with ENISA Learning and Development (L&D) Policy.
Description of data categories	<p>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).</p> <p>2) Specific for the security awareness training platform (processor KnowBe4): name, email address, telephone number, security awareness training and simulated phishing campaigns results and metrics, IP address, web browser information.</p> <p>3) Name, email address, location (when enabled), courses enrolled to and progress (along with any other date the staff are volunteering adding i.e. profile picture, linking in with a personal account etc.)</p>
Time limits (for the erasure of data)	<p>Personal data are processed by ENISA's HR for up to 5 years after the end of a service or contract with service providers.</p> <p>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 conditions of the EC SCCs signed between ENISA and the processor).</p>



Data recipients	<p>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.</p> <p>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.</p>
Transfers to third countries	<p>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 signed between ENISA and KnowBe4. The processor has executed EC SSCs with all its sub-processors involved in the processing (sub-processors are explicitly listed as an Annex to the EC SCCs between ENISA and the processor).</p> <p>Regarding AIHR, a list of sub-processors is based outside the EU/EEA and transfers might take place, in accordance with article 50 (1) (a) Regulation (EU) 2018/1725..</p>
Security measures - General description	General security policy and technical/organisational measures applicable to ENISA's IT systems.
Privacy statement	<p>Available at intranet.</p> <p>EU-Learn privacy policy available on the EU Learn website.</p>

