



Dear Parents/Legal Representatives,  
Dear Pupils,

As part of a school project, pupils from the Secondary Cycle of the European School of Luxembourg I have chosen radio as their theme.

The objectives of this workshop will be to:

- Teach pupils how to prepare interviews on various topics;
- Conduct these interviews;
- Edit them using [Audacity](#) software (with audio files saved locally, rather than using the Cloud solution offered by Audacity); and
- Share the content on the [Audioblog](#) platform provided by the television channel [ARTE](#).

In compliance with Regulation (EU) 2016/679 of the European Parliament and the Council of 27 April 2016, our School is required to obtain written consent from parents/legal representatives for minors, or from individuals themselves if they are of legal age (18), in order to record and broadcast their voice and, potentially, their identity.

The European School of Luxembourg I (hereinafter referred to as "the School") is committed to respecting your privacy and meeting the requirements of Regulation (EU) 2016/679 of the European Parliament and the Council of 27 April 2016 concerning the protection of individuals with regard to the processing of personal data and the free movement of such data (hereinafter referred to as the "GDPR").

As a result, personal data of pupils, their parents/legal representatives, interviewees, and, if they are minors (under 18), their parents/legal representatives, will be collected and shared with Audioblog (voices and, potentially, the identity of the people heard on the audio recordings).

According to Article 4(7) of the GDPR, the 'data controller' is the natural or legal person, public authority, service, or other body which, alone or jointly with others, determines the purposes and means of processing. Given that each European School has its own legal personality, the Director of each School is considered the data controller.

For this reason, the *Audacity* programme and the *Audioblog* platform have been evaluated by the Data Protection Officer (DPO) of our School:

### 1) **Audacity**

Audacity is a Cypriot entity (a country within the EU) and, from version 3.0.3 onwards, collects data such as IP addresses and operating system-related information. In accordance with their privacy policy ([Link](#)), for the purpose of update verification, the IP address is fully anonymised before being recorded. For error reports, the IP address is completely removed. Furthermore, all data is anonymised before storage and deleted within twelve (12) months following its collection.

## 2) **Audioblog**

*Audioblog* follows the guidelines of the European General Data Protection Regulation (GDPR). The data that the school requests it to process will be hosted in Germany (EU) and will be used solely for the purposes of the applications in question. This data will be automatically deleted three (3) years after its last use.

As part of this activity, the **voice** and, potentially, the **identity** of the pupils involved in the project, as well as the individuals being interviewed, may be heard:

- Regarding the pupils' recordings: the recordings will be stored on *Microsoft O365* of the European Schools;
- Then, through a podcast, the recordings will be broadcasted on the *Audioblog* platform.

Additionally, in order to collect and share this personal data on the *Audioblog* platform, our School must first obtain consent from the pupils, their parents/legal representatives, the interviewees, and, if they are minors, their parents/legal representatives.

This Privacy Statement informs you about how the School processes personal data collected as part of this activity. Thus, it describes the types of personal data that the School may collect, explains why the School processes such personal data, and specifies your rights with respect to the personal data collected.

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### 1. **Data collected by the School as part of this project**

- Pupil: Name(s), First Name(s), Class, Phone number, Voice and Comments;
- Parents/Legal Representatives<sup>1</sup>: Name(s) and First Name(s);
- Teacher(s) in charge of the project: Name(s), First Name(s), Voice and Comments;
- Persons interviewed: Name(s), First Name(s), Voice, Comments and Signature;
- Parents/Legal Representatives of interviewees<sup>2</sup>: Name(s), First Name(s) and Signature.

**NOTA**: Consent forms for the pupils will be collected via an electronic Microsoft Forms questionnaire, while consent for the interviewees will be obtained through a paper form. This paper document must be submitted to the teacher responsible for the project.

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<sup>1</sup> Information collected only if the pupil is under eighteen (18) years of age

<sup>2</sup> Information collected only if the person interviewed is under eighteen (18) years of age

## 2. Data collected by Audioblog

To create an account on Audioblog, the teacher in charge of the project must fill in the following information:

- **Teacher:** Name(s), First Name(s), Professional email address; Login; Passwords.

## 3. Data collected by Audioblog

To create an account on Audioblog, the teacher in charge of the project must fill in the following information:

- **Pupils:** Voice, Comments, and potentially, First name and/or pseudonym;
- **Persons interviewed:** Voice, Comments<sup>3</sup>, and potentially, Name(s) and/or First Name(s);
- **Teacher:** Voice, Comments, and potentially, Name(s) and/or First Name(s);

## 4. Purposes of data processing

- Inform the project stakeholders;
- Manage the consents; and
- Share the interviews.

## 5. Legal basis

Although the programme is intended for educational purposes, the School must obtain consent from parents/legal representatives, or from individuals themselves if they are of legal age, to authorise the recording and broadcast of each person's voice.

In the event of a refusal, the decision of the parents/legal representatives or of the individual if they are at least eighteen (18) years old, will be fully respected, and the recording will be deleted and not broadcast on Audioblog.

## 6. Data Storage

### 1) Electronic data of the School (*Microsoft Forms* questionnaire + Audio recordings)

Storage within the European Union.

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<sup>3</sup> Depending on the individual's comments, it should be considered that the data collected and shared may be expanded, and thus not limited to what is initially recorded (for example, if the individual discloses their role within an organisation).

The electronic data entered will be saved in O365 (see article 4, point “a”, paragraph 2 of our privacy policy; link : [Privacy Statement of the European School Luxembourg I](#))

## 2) Paper documents (Consent of the interviewed persons)

These documents will be kept at the School by the teacher in charge of the project.

## 3) Data on Audioblog platform

Storage within the European Union (servers are based in Germany).

## 7. Data retention periods

Consent collected through Microsoft Forms: Until the end of the current school year;

Paper consent: In order to be consistent with Audioblog's policy, consents will be kept for up to three (3) years after the most recent use of the recording by *Audioblog*<sup>4</sup>;

Audioblog: Data will be automatically deleted three (3) years after its most recent use.

## 8. Exercise of 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, right to erasure of your data, and you also have the right to object to their processing.

When the School processes personal data with your consent, this consent may be withdrawn at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal. In order to facilitate the exercise of your rights, you can send your request to our Data Protection Correspondent: [LUX-DPO-CORRESPONDENT@eursc.eu](mailto:LUX-DPO-CORRESPONDENT@eursc.eu)

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

If you consider that the School has not complied with the data protection laws applicable (including the GDPR) or that your rights have been infringed as the result of the processing of your personal data, you have the right of recourse and can contact the “Commission nationale pour la protection des données” ([www.cnpd.lu](http://www.cnpd.lu)).

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<sup>4</sup> This period may be reduced if the recording is removed from the Audioblog platform before the end of the period.



## Schola Europaea Luxembourg I

Privacy Policy:

Radio Project with AudioBlog

### 10. Additional information

We also invite you to consult the [Privacy Statement of the European School Luxembourg I](#)

## Annex: Authorisation for the use of interviewees' voices



### Schola Europaea Luxembourg I

Projet Radio / Radio Project :

Consentement droit d'utilisation de la voix /  
Consent for Voice usage right

#### English Version:

As part of the "Radio Project" for Secondary Cycle pupils at the European School of Luxembourg I, you, if you are at least eighteen (18) years old, or your child, if they are under eighteen (18), have been invited for an interview.

This interview will be recorded and shared on the [Audioblog](#) platform provided by the [ARTE](#) television channel.

After evaluation by the school's Data Protection Officer (DPO), Audioblog complies with the European General Data Protection Regulation (GDPR). The data the school requests to process is hosted in Germany (EU) and is used solely for the purposes of the applications involved. This data is automatically deleted three (3) years after the last use.

Thus, as part of this activity, the **voice** and potentially the **identity** of the person being interviewed may be heard:

- In the pupils recording: saved on Microsoft O365 of the European Schools;
- Then, through a podcast, broadcasted on Audioblog.

In compliance with Regulation (EU) 2016/679 of the European Parliament and Council of April 27, 2016, our school is required to obtain the consent from parents/legal representatives for minors (under 18), or from the individuals themselves if they are adults (18 and more), to record and broadcast the voice and, potentially, the identity of the person.

You have the right to access, rectify, object to, erase, and limit the processing of your data (within the limits of compatibility with the performance of our tasks). When the school processes personal data based on your consent, this consent may be withdrawn at any time. Withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal. To facilitate the exercise of your rights, you can send your request to our Data Protection Officer via the email address: [LUX-DPO-CORRESPONDENT@eursc.eu](mailto:LUX-DPO-CORRESPONDENT@eursc.eu)

After reviewing this information, we kindly ask you to complete the following document and return it to us. Should you refuse, your decision will be fully respected, and the recording will be deleted and not broadcast on Audioblog

#### Authorisation for person UNDER eighteen (18)

I, the undersigned, ....., Responsible for the child .....

in class of ..... (put complete class; Example: S2 ENB) (Tick the box corresponding to your choice)

- Give my consent to the recording of my child's voice and its broadcast on [Audioblog](#)
- Don't give my consent to the recording of my child's voice and its broadcast on [Audioblog](#)

Date, .....

Signature :

#### Authorisation for person of eighteen (18) minimum

I, the undersigned, .....

(Tick the box corresponding to your choice)

- Give my consent to the recording of my voice and its broadcast on [Audioblog](#)
- Don't give my consent to the recording of my voice and its broadcast on [Audioblog](#)

Date, .....

Signature :