



Dear Parents/Legal Representatives,  
Dear Pupils,

The European Schools aim to achieve two objectives: delivering formal education and fostering pupils' personal development within a wider social and cultural context. To ensure the holistic development of its secondary school pupils, a range of programmes have been established in the European Schools to help pupils become responsible and solidary citizens and to gain valuable insights into the world of work. Two programmes have been developed for this purpose: **Work Experience (WEX)** and the **Citizenship Actions for All Programme (CAAP)**. Since both programmes are complementary and target a similar age group, it has been decided to draw up a structured framework for both programmes.

The main aim of WEX is to provide pupils with experience of an adult working environment. Work experience usually gives pupils a realistic idea of the nature of certain types of employment and can therefore be very helpful in making career or higher education choices. The programme is not intended as training for a particular career. The selection of the host organization is the responsibility of the student and/or their parents/legal representatives.

Young people in the European Schools system will be encouraged to support their local community through acts of service and participation in a range of concrete activities. Through CAAP pupils will engage in activities such as volunteering in local community groups, supporting the work of local charities, engaging in environmental work, or assisting with groups to support children and adults with special educational needs and/or physical disabilities. Young people will be encouraged to use their initiative to identify other possible areas for involvement in their local communities.

According to document 2024-01-D-33-en-2, all pupils in the European Schools network must follow at least one of the two programs, ideally both. This means that following at least one of the two programs – either WEX or CAAP – is mandatory. Consequently, if pupils choose to follow a second program after the first mandatory one, their participation will be subject to a voluntary process and requires prior authorization from their parents/legal representatives if the pupils are under eighteen (18) years old, or from the pupils themselves if they are over eighteen (18) years old.

To ensure the proper implementation of these programs in compliance with the legislation, an agreement must be drawn up between the Host Company/Organization, the School, the Pupil, and their Parents/Legal Representatives (if the student is under eighteen (18) years old).

In the context of Regulation (EU) 2016/679 of the European Parliament of 27 April 2016 on the protection of individuals with regard to the processing of personal data: **General Data Protection Regulation (GDPR)**, the European School of Luxembourg I is required to manage a certain amount of personal data.

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 of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data (hereinafter referred to as the "GDPR").

This Privacy Statement informs you about how the School processes personal data collected as part of these actions. 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.

## 1. Collected data through the agreement

- Pupil: Name(s), First Name(s), Date of birth, Class, Phone number, Mobile phone number, Email address, Postal address, Initials and Signature
- Parents/Legal Representatives (if pupil is under eighteen (18)): Name(s), First Name(s), Phone number, Mobile phone number, Email address, Initials and Signature
- Company/Organisation:
  - Representative of the entity: Name(s), First Name(s), Email address, Position and Phone number, Initials and Signature
  - Responsible of the pupil: Name(s), First Name(s), Position and, potentially, Initials and Signature
- School:
  - Representative of the entity: Name(s), First Name(s), Email address, Position and Phone number and, potentially, Initials and Signature
  - WEX or CAAP Coordinator(s): Name(s) and First Name(s)
  - Teacher responsible of the pupil: Name(s) and First Name(s)

## 2. Purposes of data processing

The School will use the personal data collected for the following purposes:

- Document management and distribution;
- Organization of program implementation;
- Preparation of the agreement between the involved parties;
- Providing the pupil's name, first name, and date of birth to the insurance company.



### 3. Legal basis

The purpose of the European School Luxembourg I is to provide children with quality teaching and learning, in the public interest.

As part of the **MANDATORY** monitoring of the first program, either Work Experience (WEX) or the Citizenship Actions for All Programme (CAAP), this activity will be carried out in the public interest.

For the **OPTIONAL** monitoring of a second program, either Work Experience (WEX) or Citizenship Actions for All Programme (CAAP), this activity will be carried out based on consent.

Therefore, if a pupil participates in a second program after completing the first mandatory one, their participation will require prior authorization from their Parents/Legal Representatives if the pupil is under eighteen (18) years old, or from the pupil themselves if they are over eighteen (18) years old. Additionally, as the second program is optional, enrolling the pupil voluntarily will be considered as giving consent.

### 4. Data Storage

#### 1) Electronic data (Emails exchanges, etc. ...)

Storage within the European Union.

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 (Agreement)

These documents will be kept at the School. (A copy of the signed agreement will be provided to the host entity, as well as to the pupil and his/her parents/legal representatives).

### 5. Data retention periods

The agreement kept by the School will be attached to the pupil's individual file. Also, in accordance with Article 6 of the European School Luxembourg I Privacy Statement, we will retain personal data for as long as pupils are enrolled at our school. Once pupils have completed their studies at our school, we will keep their individual files for ten (10) years.

### 6. 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)

## 7. 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)).

## 8. Additional information

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