



Centre de Langue et de Culture Chinoises du Luxembourg

卢森堡中国语言文化中心

**CLCCL PROCEDURE TO HANDLE PERSONAL DATA (V.02-26.05.2018)  
in compliance with the EU GDPR (General Data Protection Regulation) entered in  
force across the EU on 25<sup>th</sup>. May 2018**

**1. Provision:**

It is a new data privacy law that provides EU citizens with more protection and accessibility to their personal information, and will force schools to be transparent about how they manage private student information. It is the responsibility of CLCCL to ensure that any personal information received regarding a EU citizen is collected and stored securely. The only people who should have access to that information are the individuals the information pertains to, and the school admins that need to access it in order to do their job.

**2. Compliance:**

The information acquired by CLCCL and its experts during their activities in the school is processed in a full confidential manner only for the administration management with regard to the students in their regular activities, and is not be forwarded to other party neither outside the institution.

The principles of data protection (security of information) applies to hold the accounts containing personal data when CLCCL process such personal data (organisation of the classrooms, filing system under key in cupboard, collection of data from new members or students, consultations in the office only or in other secured place where data cannot be stolen. No transmission is done except by the Director for the purpose of the law requesting the reporting to the RCS under its Art.10.

For that purpose only the Director and its data protection officer are entitle to access the data ensuring a level of security of processing to prevent an unauthorised disclosure.

**3. Teachers contract:**

CLCCL has employment contracts to insure the full compliance with the provisions of the GDPR.

**Obligation de secret et protection des données (en application de la Réglementation Européenne GDPR entrée en force le 25 Mai 2018)**



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### Art.3

..... s'oblige à garder le secret sur les informations confidentielles acquises lors de l'exercice de ses fonctions au sein du CLCCL et reconnaît être informé de la procédure du CLCCL en place en conformité avec le traitement des données à caractère personnel et en conformité avec la réglementation européenne entrée en vigueur le 25 mai 2018 sur la transparence de l'utilisation et sur la protection des données à caractère personnel et ce, sur tous les types de média utilisés (électronique ou papier). Il s'engage à ne pas utiliser les données confidentielles et à caractère personnel, relatives aux étudiants, à des fins autres que celles d'exécution et de gestion du présent contrat.

### **4. Virtual Classroom**

Regarding the new technology implemented by CLCCL for its Virtual Classroom, the same care about the electronic data will apply, even if the school is using only nicknames without address or further references associated.

In case of automated means (login, invitation by mail), all measures are implemented for preventing unauthorised person from gaining access to computer systems providing personal data. Only authorised and accredited teachers under specific contracts are entitled to access only part of the data (read only mode) and the system.

CLCCL or its data protection officer prevents the unauthorised reading, copying, and alteration of the personal data.

The system used in the classroom will not store personal data accessible through the terminal equipment neither using the data through a network. The storage of the data is done only on paper separately.

The CLCCL virtual classroom is not making use of any social network to guaranty the privacy of its data and students profile.

Only Nicknames is used to mitigate the impact of any breach of the electronic equipment.

To keep in mind the confidentiality of the data, no billing data is implemented through the public network.

Please be insured that CLCCL is committed to respecting your privacy and the privacy of your children and to complying with the requirement of the GDPR<sup>1</sup>

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<sup>1</sup> Regulation (EEU) 2016//6679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95//446//EEC (General Data Protection Regulation), OJL 119 from 4.5.2016.