

## Data Protection & Information Security Overview

**Digital Skills Framework Contract – Lot 2 (EC-HR/2024/OP/0013) for European Commission Institutions and other EU bodies.**

### Executive Summary

This document is provided for transparency and informational purposes and summarises the data protection and information security approach applied by the Abilways and Learning Tree International consortium when Learning Tree International is delivering services under the Digital Skills Framework Contract – Lot 2 (EC-HR/2024/OP/0013) for European Commission Institutions and other EU bodies.

### Learning Tree International – Data Processing & Security Overview

#### 1. Contractual & Legal Framework

All training delivery under Contract EC-HR/2024/OP/0013 – Lot 2 operates under a single European Commission framework agreement, with each participating agency engagement onboarded individually to ensure compliance with EC security protocols and Learning Tree’s data governance standards.

European Commission institutions act as Data Controllers. Learning Tree International and Abilways operate as Data Processors and/or Sub-processors in accordance with Regulation (EU) 2018/1725, Article 28 GDPR, and applicable framework contractual clauses.

Standard Contractual Clauses apply across the framework and are not re-signed for each individual purchase order.

#### 2. Categories of Personal Data Processed

Personal data processed is strictly limited to what is necessary for training delivery:

- Participant name
- Professional email address
- Training registration, attendance, and completion records

No special-category or sensitive personal data is collected. Participant data is not used for marketing or secondary purposes, in line with contractual requirements.

#### 3. Purpose of Processing

- Personal data is processed solely to:
- Register participants on Learning Tree systems
- Deliver instructor-led or virtual training
- Provide access to course materials or learning environments
- Issue certificates of completion where applicable

No secondary processing activities are performed.

#### 4. Data Transfers & International Safeguards

Where personal data is shared with Learning Tree International, Inc. (USA):

- Transfers rely on EU Commission Standard Contractual Clauses (Controller-to-Processor)
- Learning Tree International is certified under the EU-U.S. Data Privacy Framework

Official listing: <https://www.dataprivacyframework.gov/list>

Should the transfer mechanism change, European Commission Controllers are informed without delay.

\*Entry into force 16.05.2025. Latest update: April 20th 2026



## 5. Security & Technical Measures

Before activating any accounts, learning platforms, or virtual machines, Learning Tree verifies secure data handling, compliance with confidentiality obligations, and adherence to European Commission security requirements.

Measures include:

- Role-based access control
- Encrypted data transmission
- Multi-factor authentication
- Staff confidentiality obligations
- Documented incident response procedures.

## 6. Learning Platforms & Labs

Where hands-on learning labs are used:

- Anonymised or pseudonymised access is applied where platform design allows
- Some certification or accreditation bodies (e.g. Microsoft, CompTIA) require a working email address for learner validation
- The European Commission has confirmed pseudonymisation is not required where there is no direct system-to-system integration with EU Learn.

## 7. Data Retention

Personal data is retained only for as long as necessary to deliver training, meet contractual reporting obligations, and support audits where required. Data is securely deleted or archived in line with Learning Tree retention policies and European Commission contractual terms.

## 8. Privacy Notice

Learning Tree International's Privacy Notice is available at: <https://www.learningtree.co.uk/contact-us/privacy/>

In line with European Commission contract requirements, participant data is not used for marketing purposes.

## 9. Notifications

Notifications of personal data breaches are made in accordance with contractual and legal requirements. Learning Tree International operates and maintains a quality management system aligned with ISO 9001 requirements.

Contact

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