

## **PROTECTION OF YOUR PERSONAL DATA**

**This privacy statement provides information about the processing and the protection of your personal data.**

**Processing operation:** Email system at the European Labour Authority

**Data Controller:** European Labour Authority, Resources Unit, ICT and facilities (ELA ICT Team)

**Record reference:** DPR-ELA-2022-0011

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## 1. Introduction

The European Labour Authority (hereafter 'ELA') is committed to protect your personal data and to respect your privacy. ELA collects and further processes personal data pursuant to [Regulation \(EU\) 2018/1725](#) of the European Parliament and of the Council of 23 October 2018 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data (repealing Regulation (EC) No 45/2001).

This privacy statement explains the reason for the processing of your personal data, the way we collect, handle and ensure protection of all personal data provided, how that information is used and what rights you have in relation to your personal data. It also specifies the contact details of the responsible Data Controller with whom you may exercise your rights, the Data Protection Officer and the European Data Protection Supervisor.

The information in relation to processing operation "Email system at the European Labour Authority" undertaken by European Labour Authority, Resources Unit, ICT and facilities (ELA ICT Team) is presented below.

## 2. Why and how do we process your personal data?

Purpose of the processing operation: ELA ICT Team collects and uses your personal information to enable electronic communication, in particular the exchange of electronic messages and attachments, amongst ELA staff, with external partners of the European Labour Authority and with the general public (EU citizens etc.).

Only non-classified information may be communicated on the ELA email systems; confidential information must be encrypted.

Your personal data will not be used for an automated decision-making including profiling.

## 3. On what legal ground(s) do we process your personal data

We process your personal data, because, according to Article 5(1)(a), the processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Union institution or body.

### Legal basis

Regulation (EU) 2019/1149 of the European Parliament and of the Council of 20 June 2019 establishing a European Labour Authority.

We do not process **special categories of personal data**, therefore Article 10 of the Regulation does not apply.

## 4. Which personal data do we collect and further process?

In order to carry out this processing operation ELA ICT Team collects the following categories of personal data:

- **Identification data:** Professional email address, First name, last name, Office location (building, floor, room), Office phone number, Affectation (Directorate General, Service, Department...), Mobile phone number (for "users" who have provided this information in their M365 User Account on a voluntary basis); Picture (for "users" who decided to make one available) (managed by each "user" for themselves); Responsibility on functional

(shared) mailboxes; Membership of distribution groups (usually related to the affectation, the business roles and/or the rights on IT systems).

— **Email messages information:** header, subject, body and attachments, Calendar items and tasks (including their header, body and attachments), Any other types of documents with their own specific characteristics, Name of the mailbox folder in which the document is stored, Meta-data about those email messages, calendar items and other documents, as automatically generated by the email systems (e.g. the date when the document was stored in the system, a status such as “read” or “recently deleted”...), Invitations, which is actually just a specific type of email message, Sender (source: meta-data of the message transmission), Recipients towards which the ELA email systems are asked to route the message (source: meta-data of the message transmission), Date and time of handling by ELA email servers (source: the email system).

**Log files:** Information logged regarding user access to the email system and activity:

— Details about each access: date/time, username, source IP address, protocol and/or used software (depending on the type of access) and who performed certain types of actions (esp. items deletion) and when.

The process of personal data is necessary for the management and functioning of EU institutions and bodies.

#### **5. How long do we keep your personal data?**

ELA ICT Team only keeps your personal data for the time necessary to fulfil the purpose of collection or further processing, namely for:

- Identification data: Address book entry will be kept for **6 months** after the deletion of their owner’s user account.
- Messages and documents stored in mailboxes will be stored centrally **for 6 weeks after the departure of the user** and deleted after this period.
- Message or document deleted from a mailbox: will be stored centrally **for 6 weeks after the departure of the user** and deleted after this period
- Traffic logs, clean-up logs, system usage logs, system access logs will be kept for a maximum of 6 months.

#### **6. How do we protect and safeguard your personal data?**

All personal data in electronic format (e-mails, documents, databases, uploaded batches of data, etc.) are stored either on the servers of the European Labour Authority or of its contractors.

ELA’s contractors are bound by a specific contractual clause for any processing operations of your data on behalf of ELA, and by the confidentiality obligations deriving directly from the General Data Protection Regulation in the EU Member States (*‘GDPR’ Regulation (EU) 2016/679.*)

In order to protect your personal data, ELA has put in place a number of technical and organisational measures in place. Technical measures include appropriate actions to address online security, risk of data loss, alteration of data or unauthorised access, taking into consideration the risk presented by the processing and the nature of the personal data being processed. Organisational measures include restricting access to the personal data solely to authorised persons with a legitimate need to know for the purposes of this processing operation.

## **7. Who has access to your personal data and to whom is it disclosed?**

Access to your personal data is provided to ELA staff responsible for carrying out this processing operation and to authorised staff according to the “need to know” principle. Such staff abide by statutory, and when required, additional confidentiality agreements.

All the users have access to the information mentioned under identification data. Email messages information will be received by specific recipients.

In case of an incident, access to log files is provided to ELA ICT Team and the CERT-EU staff responsible for carrying out this processing operation and any other authorised staff according to the “need to know” principle. Such staff abide by statutory, and when required, additional confidentiality agreements. GlobalSign have access to Common name (Name and Surname), Organization, Organizational Unit, Locality, State of Province, Country, Email Address.

European Commission will receive Name, Surname, Organization, E-mail, Telephone number, Office and Department. European Commission will receive periodically an update on ELA staff in order to be integrated on the Global Address Book. This processing of personal data is covered by the European Commission Record: DPR-EC-03610 Email system of the European Commission, under DG Informatics (DG DIGIT).

The information we collect will not be given to any third party, except to the extent and for the purpose we may be required to do so by law.

## **8. What are your rights and how can you exercise them?**

You have specific rights as a ‘data subject’ under Chapter III (Articles 14-25) of Regulation (EU) 2018/1725, in particular the right to access, your personal data and to rectify them in case your personal data are inaccurate or incomplete. Where applicable, you have the right to erase your personal data, to restrict the processing of your personal data, to object to the processing, and the right to data portability.

You have the right to object to the processing of your personal data, which is lawfully carried out pursuant to Article 5(1)(a) on grounds relating to your particular situation.

You can exercise your rights by contacting the Data Controller, or in case of conflict the Data Protection Officer. If necessary, you can also address the European Data Protection Supervisor. Their contact information is given under Heading 9 below.

Where you wish to exercise your rights in the context of one or several specific processing operations, please provide their description (i.e. their Record reference(s) as specified under Heading 10 below) in your request.

## **9. Contact information**

### **- The Data Controller**

If you would like to exercise your rights under Regulation (EU) 2018/1725, or if you have comments, questions or concerns, or if you would like to submit a complaint regarding the collection and use of your personal data, please feel free to contact the Data Controller:

[ict@ela.europa.eu](mailto:ict@ela.europa.eu)

- **The Data Protection Officer (DPO) of ELA**

You may contact the Data Protection Officer ([data-protection@ela.europa.eu](mailto:data-protection@ela.europa.eu)) with regard to issues related to the processing of your personal data under Regulation (EU) 2018/1725.

- **The European Data Protection Supervisor (EDPS)**

You have the right to have recourse (i.e. you can lodge a complaint) to the European Data Protection Supervisor ([edps@edps.europa.eu](mailto:edps@edps.europa.eu)) if you consider that your rights under Regulation (EU) 2018/1725 have been infringed as a result of the processing of your personal data by the Data Controller.

**10. Where to find more detailed information?**

ELA Data Protection Officer (DPO) publishes the register of all processing operations on personal data by ELA, which have been documented and notified to him. You may access the register via the following link: <https://www.ela.europa.eu/en/privacy-policy>

This specific processing operation has been included in the DPO's public register with the following Record reference: DPR-ELA-2022-0011 Email system at the European Labour Authority.