



**European Labour Authority**

DATA PROTECTION OFFICER

**RECORD OF PROCESSING OPERATIONS ON PERSONAL DATA**

DPR-ELA-2022-0024 ELA Contact lists & network partners databases

**1 PART 1: PUBLIC - RECORD (ARTICLE 31<sup>1</sup>)****1.1 GENERAL INFORMATION**

|  |  |
|--|--|
| <b>Record reference</b>  | DPR-ELA-2022-0024  |
| <b>Title of the processing operation</b>                                 | ELA Contact lists & network partners databases   |
| <b>Controller entity</b>   | European Labour Authority, Governance and Coordination, Communication (ELA Communication Team)   |
| <b>Joint controllers</b>   | <input checked="" type="checkbox"/> N/A <input type="checkbox"/> YES, fill in details below  |
| <b>Processor(s)</b>  | <input type="checkbox"/> N/A <input checked="" type="checkbox"/> YES, fill in details below  |
| <b>External organisation(s)/entity(ies)</b><br>Names and contact details | <input checked="" type="checkbox"/> YES<br>Microsoft Ireland South County Business Park, One Microsoft Place, Carmanhall and Leopardstown, Dublin, D18 P521, Ireland.<br><br>Personal data may be communicated to an external entity assisting the European Labour Authority in fulfilling the objective for which the data is managed.<br><br>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. |
| <b>Data Protection Officer</b><br>Name and contact details               | Laura NUNEZ BAREZ<br>Landererova 12,<br>811 09 Bratislava I<br>Slovakia<br>Email: data-protection@ela.europa.eu  |
| <b>Corporate Record</b>  | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  |
| <b>Language of the record</b>  | English  |

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<sup>1</sup> Pursuant to **article 31** of the new data protection regulation for EU institutions and bodies (**Regulation (EU) 2018/1725**) each controller and processor have to maintain a **record of processing activities** under its responsibility that contains at least the information listed under that article.

**1.2 PURPOSE AND DESCRIPTION OF THE PROCESSING****1.2.1 Purpose**

This processing of personal data allows the European Labour Authority (ELA) to manage lists of partners and stakeholders who, either in their personal capacity or on behalf of an organisation, are in contact and collaborate with ELA, or are interested in ELA's work and its contribution to EU policies.

**1.2.2 Processing for further purposes**

- ☐ Archiving in the public interest
- ☐ Scientific or historical research purposes
- ☒ Statistical purposes

**1.2.3 Modes of processing**

1. ☒ Automated processing (Article 24)
  - a. ☒ Computer/machine
    - i. ☐ automated individual decision-making , including profiling
    - ii. ☐ Online form/feedback
    - iii. ☒ Any other, specify  
Some databases use automatic search interfaces.
2. ☒ Manual processing
  - a. ☒ Word documents
  - b. ☒ Excel sheet
  - c. ☒ Any other, specify  
Filing system (on paper or digital) in ad hoc files within Unit(s).

**1.2.4 Storage medium**

1. ☒ Paper
2. ☒ Electronic
  - a. ☒ Digital (MS documents (Word, excel, Powerpoint), Adobe pdf, Audiovisual/multimedia assets, Image files (.JPEG, .PNG, etc.))
  - b. ☐ Databases
  - c. ☒ Servers
  - d. ☒ Cloud
3. ☒ External contractor premises

**Description:**

Paper and/or digital media on ELA servers.

**1.2.5 Comments on the processing of the data**

The processing operations on personal data covered by this generic notification are those which could not be covered by existing notifications related to:

- DPR-ELA-2022-0023 ELA live, hybrid and digital events, seminars, workshops, conferences, meetings, open/celebration/information days with or without outside participants
- DPR-ELA-2022-0003 Managing award procedures for procurement, grants and the selection of experts, and managing the execution of (procurement and experts) contracts and implementation of agreements (grants)

**1.3 DATA SUBJECTS AND DATA CATEGORIES****1.3.1 Data subjects' categories**

|                             |  |
|-----------------------------|--|
| 1. Internal to organisation | <input checked="" type="checkbox"/> Yes<br>Staff involved in ELA activities and labour mobility across the Union and coordination of social security systems.  |
| 2. External to organisation | <input checked="" type="checkbox"/> Yes<br>Stakeholders and partners involved in ELA activities and labour mobility and social security systems and members of the public who wish to receive information on ELA activities. |

**1.3.2 Data categories/fields**

Title, gender, name/surname, company/organisation name, position, nationality, place/date of birth, private and/or professional email address, private and/or professional postal address, office/private phone/fax, website; fields of interest, preferred/default language, information distribution format desired (for publications).

**1.3.2.1 Special categories of personal data**

Indicate if the processing operation concerns any 'special categories of data' which fall(s) under Article 10(1), which shall be prohibited unless any of the reasons under article 10(2) applies:

☐ Yes , the processing concerns the following special category(ies):

Data revealing

- ☐ racial or ethnic origin,
- ☐ political opinions,
- ☐ religious or philosophical beliefs,
- ☐ trade union membership,

Or/and,

- ☐ Genetic data, biometric data for the purpose of uniquely identifying a natural person,
- ☐ Data concerning health,
- ☐ Data concerning a natural person's sex life or sexual orientation.

☒ N/A

**1.3.2.2 Data related to 'criminal convictions and offences'**

|  |   |
|--|---|
| The data being processed contain sensitive data which fall(s) under Article 11 'criminal convictions and offences' | N/A <input checked="" type="checkbox"/><br>Yes <input type="checkbox"/> |
|--|---|

**1.4 RETENTION PERIOD**

Indicate the administrative time limit(s) for keeping the personal data per data category, and if known, specify the start/end date, or describe the specific start/end moment of each time limit:

| Data category  | Retention period   | Optional          |                 |
|--|--|-------------------|-----------------|
|  |  | Start date/moment | End date/moment |
| Personal data under article 5 (1) (a) of Regulation (EU) 2018/1725 ( <i>public interest on the basis of the Treaties</i> ) | The data is kept as long as the data subject collaborates with ELA in his/her position based on the relevant appointment or contract   |                   |                 |
| Personal data under article 5 (1)(d) of Regulation (EU) 2018/1725 ( <i>consent</i> )                                       | The data is kept as long as ELA continues to work in support of labour mobility and social security systems, or until the data subject requests to be deleted from the list. |                   |                 |

**1.5 RECIPIENTS**

| Origin of the recipients of the data                               |  |
|--|--|
| 1. <input checked="" type="checkbox"/> Within the EU organization  | Authorized officials and other staff of ELA  |
| 2. <input checked="" type="checkbox"/> Outside the EU organization | Data may be communicated to an external entity assisting the European Labour Authority in fulfilling the objective for which the data is managed |

| Categories of the data recipients  |
|--|
| 1. <input checked="" type="checkbox"/> A natural or legal person<br>2. <input checked="" type="checkbox"/> Public authority<br>3. <input checked="" type="checkbox"/> Agency<br>4. <input checked="" type="checkbox"/> Any other third party, specify<br><br>In some particular cases, data may be communicated to an external entity assisting the European Labour Authority in fulfilling the objective for which the data is managed. |

**Description**

Authorized officials and other staff of the European Labour Authority.

In some specific cases, personal contact data could be published on a publicly available website of the European Labour Authority. An additional opt-in option is proposed to confirm acceptance to such publication.

For the particular case of the European Labour Authority Management Board, a separate processing may take place according to point (d) of Article 5(1) for publication of personal data on ELA websites and/or share personal data among members of the Board.

**1.6 INTERNATIONAL DATA TRANSFERS**

| Transfer to third countries or international organisations of personal data   |
|---|
| <b>1. Transfer outside of the EU or EEA</b><br><input checked="" type="checkbox"/> N/A, transfers do not occur and are not planned to occur<br><input type="checkbox"/> YES,  |
| <b>2. Transfer to international organisation(s)</b><br><input checked="" type="checkbox"/> N/A, transfers do not occur and are not planned to occur<br><input type="checkbox"/> Yes, specify further details about the transfer below |

**1.7 INFORMATION TO DATA SUBJECTS ON THEIR RIGHTS**

| Rights of the data subjects  |
|--|
| <i>Article 17 – Right of access by the data subject</i><br><i>Article 18 – Right to rectification</i><br><i>Article 19 – Right to erasure (right to be forgotten)</i><br><i>Article 20 – Right to restriction of processing</i><br><i>Article 21 – Notification obligation regarding rectification or erasure of personal data or restriction of processing</i><br><i>Article 22 – Right to data portability</i><br><i>Article 23 – Right to object</i><br><i>Article 24 – Rights related to Automated individual decision-making, including profiling</i> |

**1.7.1 Privacy statement**

- ☒ The data subjects are informed about their rights and how to exercise them in the form of the a privacy statement attached to this record.

**Publication of the privacy statement**

- ☒ Published on website

Web location:

- ELA internal website ☒ (URL: ELA SharePoint on personal data protection)
- External website ☒ (URL: ELA Public register of records on personal data)

- ☒ Guidance for Data subjects which explains how and where to consult the privacy statement is available and will be provided at the beginning of the processing operation.

Guidance on data subjects rights on ELA main website

**Description:**

The data subject will be informed when consulting the website or by email of the privacy statement, that will be enclosed to the message or reachable through a clickable link.

On the basis of a justified question by the data subject to the Controller by means of a functional mail box ( @ela.europa.eu), the requested personal data change will be implemented within 15 working days.

Two privacy Statement will be prepared together with this record in order to cover the two type of data subjects and they will need to be adapted for each specific processing.  
A third one will be prepared to cover specific process of personal data where its foreseen the publication of personal data.

- **Privacy Statement – public interest:** this template is to be used for contact lists of members of groups / networks designated by the Members States, appointed by the European Institutions/bodies or similar;
- **Privacy Statement – consent:** this template is to be used for contact lists of recipients of newsletters and information, stakeholders, participants to networks and groups and other people who have given their consent, i.e. have agreed to be put on and stay on the distribution list
- **Privacy Statement - publication:** in some specific cases, personal contact data could be published on a publicly available website of ELA. (e.g. "National Liaison Officers" containing name/surname of national contact points/scientific attachés to the EU, office phone number, e-mail and on-going activities i.e. ELA collaboration, specific events...). In this case, the data subjects have also the choice to opt-in when confirming their acceptance to this publication.

## 1.8 SECURITY MEASURES

Short summary of overall Technical and Organizational Measures implemented to ensure Information Security:

### **Description:**

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

The European Labour Authority's contractors are bound by a specific contractual clause for any processing operations of personal data on behalf of the European Labour Authority, and by the confidentiality obligations deriving from the General Data Protection Regulation.

In order to protect personal data, the European Labour Authority has put in place a number of technical and organisational measures. 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.