

[MODEL GENERIC PRIVACY STATEMENT]

NB: TEXT IN RED SHALL BE DELETED

THE TEXT IN RED PROVIDES YOU WITH GUIDANCE ON HOW TO FILL IN THIS TEMPLATE. IT SERVES TO REMIND YOU OF THE LEGAL OBLIGATIONS RELATED TO YOUR ROLE AS DATA CONTROLLER, AS WELL AS TO HELP YOU ADAPT THE STANDARD TEXT SO THAT THE INFORMATION CONTAINED IN THE PRIVACY STATEMENT IS EXTENSIVE AND CORRESPONDS TO THE PARTICULARITIES OF THE RELEVANT PROCESSING OPERATION. AFTER YOU HAVE COMPLETED THE DRAFTING OF THE PRIVACY STATEMENT, YOU SHOULD ERASE THE GUIDANCE TEXT AND MAKE SURE THAT IT DOES NOT APPEAR IN THE FINAL VERSION THAT YOU WILL PROVIDE TO THE DATA SUBJECTS.

As data controller, you are reminded about your obligations in relation to [Regulation \(EU\) 2018/1725 \('the Regulation'\)](#). In particular vis-a-vis the data subjects you need to:

- take appropriate measures to provide any information and any communication to the data subjects in a clear, *easily understandable*, transparent and concise form, as well as **facilitate for the data subjects to the exercise his or her rights** as indicated in article 14 of the Regulation.
- to **provide the data subjects with all the necessary information** as described in articles 15 and 16 of the Regulation in order to ensure a fair and transparent processing. You must ensure this information is provided to the data subjects at the very beginning of the processing of their personal data.

Therefore, **make the privacy statement available to the data subjects at the outset** when you collect the data directly from them (article 15) or when the data are *not* collected directly from the data subjects (article 16), you must ensure to communicate it within the time period specified in article 16.3(a)-(c).

It is crucial that you make the privacy statement visible and easily accessible to the data subjects. It should be provided in the most appropriate format and place (e.g. published on the relevant website, provided as part of the online form that the data subjects have to fill in, or in the acknowledgment of receipt when a data subject exercises his/her rights via an email, etc.). You should also ensure that the data subjects are adequately directed towards the privacy statements location in order to become aware of it.

Note also that the information in the privacy statement must be consistent with the relevant sections of the record of the processing operation in the Data Protection Records Register at European Labour Authority. Please verify that the information contained in both documents is the same before submitting the record and privacy statement.

PROTECTION OF YOUR PERSONAL DATA

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

Processing operation: ELA live, hybrid and digital events, seminars, workshops, conferences, meetings, open/celebration/information days and visits

Data Controller: European Labour Authority, *[Name of Unit/team responsible (entity)]*

Record reference: DPR-ELA-2022-0023

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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, in the context of *[Name of the (type of a) meeting or event]*. It explains 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 "*[indicate the name of the (type of a) meeting or event]. If appropriate, give also a short explanation of the title unless it is self-explanatory]*" undertaken by *[indicate the name of the Unit/team, i.e. the organisational entity responsible for the processing like the Unit/Sector which has determined the purpose(s) and the means of the processing of personal data. Do not indicate the name of the e.g Head of Unit.]* is presented below.

In this specific event, we are organising: *(please select one of each option presented below)*

- *Event organised by the ELA - inside ELA premises.*
- *Event organised by the ELA – outside ELA premises.*

- *Event organised by both the ELA and an external organisation - inside ELA premises.*
- *Event organised by both the ELA and an external organisation – outside ELA premises. In the specific case, the event is organised in a third country (i.e. outside the EU/EEA) or by an external company based in a third country, provisions related to international transfers will need to be considered (point 7 –international transfers)*

- *Personal data are published on a publicly available website.*
- *Personal data are NOT published on a publicly available website.*

- *Reports (including a presence list) are shared between participants and organisations.*
- *Reports (including a presence list) are NOT shared between participants and organisations.*

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

Purpose of the processing operation: *[Name of the Unit/team responsible for the event/meeting]* collects and further processes your personal data to provide you with information about the *[meeting or event]* (before, during and after) and to process your application for participation in that *[meeting or event]*.

[If using web-streaming/official photo-/videographers, add the following paragraph]

Live web-streaming and audio-visual recording at the *[name of the event or meeting]* of the speakers, organisers and participants, as well as photographs of the speakers and panoramic photographs of participants and organisers will be taken and published in the context of the *[name of the event or meeting]* at *[the Unit/team responsible of the meeting/event should indicate where the information will be published]*.

The audience or non-speaker participants are not photographed individually or in groups. They could also appear in panoramic photographs of the whole event/audience.

Participants that do not wish to be part of the above web-streaming and recording/publishing activities have the possibility to object to processing. *[Please specify how they can object (e.g. by sitting in back rows which are not recorded/photographed, by providing special badges, by offering a separate room without web-streaming, etc.). Please make sure to inform the participants of the possibility to object to processing and guide them on how to request it (e.g. by sending an e-mail to the organiser prior to the event).]*

Your personal data will not be used for any automated decision-making including profiling. For platforms and tools used to organise and manage digital events, the following records will apply:

- Webex platform: Service de Web Conference (Webex), European Commission Record - DPR-EC-05006
- Microsoft Teams: EC M365 environment, European Commission Record DPR-EC-04966
- Skype for business: Unified Communication and Collaboration (UCC), European Commission Record DPR-EC-02548
- Slido - Audience Interaction Software, European Commission Record DPR-EC-06687

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

[The data controller should note: for internal European Labour Authority meetings (of ELA staff only) and working meetings of ELA staff with the staff of the European Commission or other EU institutions and bodies and Member States (which are not comitology or expert (group) meetings), all processing could, in principle, be based on Article 5(1)(a) of Regulation (EU) 2018/1725 (including mailing lists, sending of invitations/information, sharing of attendee lists internally, etc.). In this case, please add the following:]

We process your personal data, because, according to Article 5(1)(a) of Regulation (EU) 2018/1725, 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.

The processing operations on personal data, linked to the organisation, management, follow-up and promotion of the *[meeting or event]* (including *web-streaming, photos, audio-visual recording*) are necessary for the management and functioning of the European Labour Authority, as mandated by the Treaties and Regulation (EU) 2019/1149 of the European Parliament and of the Council of 20 June 2019 establishing a European Labour Authority and Regulation (EU) 2016/589 of the European Parliament and of the Council of 13 April 2016 on a European network of employment services (EURES), workers' access to mobility services and the further integration of labour markets, Article 11 of the Treaty on European Union and Article 15 of the Treaty on the Functioning of the European Union.

[If the controller has concluded a contract with the speakers for the meeting/event, it should indicate the following:]

The processing operations on personal data of the speakers for the *[meeting or event]* with whom a contract is concluded, are carried out in line with the contractual provisions. Consequently, that processing is necessary and lawful under Article 5(1)(c) of Regulation (EU) 2018/1725 (processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract).

[For meetings with external participants (which are not comitology or expert (group) meetings nor other working meetings of ELA staff with the staff of the European Commission or any other EU institutions and bodies and Member States), the controller has to obtain consent for the processing operations indicated below. In the privacy statement, the controller should add only possibilities relevant for their meeting/event. In this case, please add the following:]

Your consent is required for *[the controller should indicate as appropriate or add additional possibilities]*:

- the processing of your personal data relating to your dietary requirements and/or access requirements;
- the sharing of the *[meeting or event]* participants list containing your name and affiliation **with other participants from the EU, EEA or any country providing adequate protection¹** in order to create working groups to continue the collaboration work launched during the meeting/event;
- the sharing of the *[meeting or event]* participants list containing your name and affiliation **with other participants from third countries or international organisations** in order to create working groups to continue the collaboration work launched during the meeting/event;
- the sharing of the *[meeting or event]* participants list containing your name and affiliation **with other recipients from third countries or international organisations** if the meeting is being organised or hosted by a third country or an international organisation or co-organised by a third country or an international organisation and the European Labour Authority.

¹ The European Economic Area (EEA) refers the EU member states and three European Free Trade Association (EFTA) states (Iceland, Liechtenstein, and Norway)

The European Commission has so far recognised Andorra, Argentina, Canada (commercial organisations), Faroe Islands, Guernsey, Israel, Isle of Man, Japan, Jersey, New Zealand, Switzerland, Uruguay and the United States of America (limited to the Privacy Shield framework) as providing adequate protection on personal data protection.

- the publication of your personal data contained in minutes, reports, powerpoint presentations or relevant documentation used during meetings **on a publicly available website or printed** to illustrate communication material, photo albums and/or videos.
- the processing of your personal data for inviting you to future events the data controller may organise;
- the processing of your personal data for managing your subscription to a newsletter of the data controller. The processing of contact list and network partners at the European Labour Authority is covered by the Record “DPR-ELA-2022-0024 ELA Contact lists & network partners databases”. *[the data controller should use the record DPR-ELA- 2022-0024 and send the Privacy Statement of this record to the participants (together with the Privacy statement on events)];*
- Individual and/or groups photographs or audio-visual recordings

If you opt-in, you are giving us your explicit consent under Article 5(1)(d) of Regulation (EU) 2018/1725 to process your personal data for those specific purposes. You can give your consent via a clear affirmative act by ticking the box(es) on the online registration form.

Your consent for these services can be withdrawn at any time:

- for unsubscribing from the newsletter, please *[click on the unsubscribe button [the data controller should indicate where] OR send an email to [the data controller should indicate the relevant functional mailbox]];*
- for withdrawing consent that you have provided in order to benefit from other services, please contact the controller of the meeting/event at *[the data controller should indicate the relevant contact point]*.

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

In order to carry out this processing operation *[the Name of the Unit/team responsible for the event/meeting, i.e. the organisational entity]* collects the following categories of personal data: *[Specify the categories of personal data concerned, remove when not collected.]*

- Name, Surname, place/date of birth, nationality, address, title, organisational unit, name of organisation represented, office/mobile phone numbers, fax number, e-mail address (functional e-mail address of organisation recommended), identity document type/number, place/date of document issue, gender (needed for the right title), eventual banking information of invited experts or participants' organisation. If needed, evaluation criteria or CV might be requested to manage events with limited or restricted available places. Minutes, reports, powerpoint presentations or relevant documentation used during meetings can be collected and shared with meeting participants.
- Information about the accommodation (hotel name and address) and flight (flight reference, company, destination,time of departure/arrival) of the participants may be collected in order to organise the transportation/reimbursement of the participants.
- Photographs/pictures of groups of participants and organizers could be taken and published in the context of the event and in the framework of the ELA activities.

- Also live web streaming and/or audio and video recording of speakers and participants can be registered and published and/or shared in the framework of the ELA activities.
- In case of external events, the payment of fees can be requested (e.g. accommodation, party,...). In case of invitation of experts, an eventual reimbursement can be provided.
- In case of events with minors, an authorisation form signed by parent/guardian/carer will be collected with the following information: student's name, birthdate and birthplace of the minor and signature of the parent, guardian, carer together with the date and place of the signature.
- Information related to the cookies used will be specified in the Privacy Statement.
- In some cases, third party IT tools, including Social Media (to be specified in the Privacy Statement by the organiser).
- For visits, a specific privacy statement will be prepared.
- For digital events, the data protection records for the relevant tools and platforms apply.

An explicit consent will be required to collect the following personal data:

- Dietary requirements and/or access requirements,
- The sharing of the participants list containing name and affiliation with other participants from the EU, EEA or any country providing adequate protection,
- The sharing of the participants list containing name and affiliation with other participants from third countries or international organisations,
- The sharing of the participants list containing name and affiliation with other with other recipients from third countries or international organisations,
- The publication of your personal data contained in minutes, reports, powerpoint presentations or relevant documentation used during meetings on a publicly available website or printed to illustrate communication material, photo albums and/or videos,
- The processing of your personal data for inviting you to future events the data controller may organise or for managing your subscription to a newsletter of the data controller. This specific case will be covered by Record "DPR-ELA-2022-0024 ELA Contact lists & network partners databases".

[The data controller should note:

- **for internal European Labour Authority meetings (of ELA staff only) and working meetings of ELA staff with the staff of the European Commission or other EU institutions and bodies and Member States**
- **if the controller has concluded a contract with the speakers for the meeting/event, it should indicate the following:**

The provision of personal data is mandatory to meet a *[statutory]/ [contractual]* requirement *[indicate which in particular]*. If you do not provide your personal data, possible consequences are *[specify].OR*

[For meetings with external participants (which are not comitology or expert (group) meetings nor other working meetings of ELA staff with the staff of the European Commission or any other EU institutions and bodies and Member States), the controller has to obtain consent for the processing operations indicated below. In the privacy statement, the controller should add only possibilities relevant for their meeting/event. In this case, please add the following:]

The provision of personal data is not mandatory.

[If you do not collect the personal data from the data subject, but from other sources, Article 16 applies. Consequently, please include the following statement:

We have obtained your personal data from *[specify type of source, and if applicable indicate whether it came from publicly accessible sources].*

5. How long do we keep your personal data?

The *(Name of the Unit/team responsible for the event/meeting)* only keeps your personal data for the time necessary to fulfil the purpose of collection or further processing.

For each of the categories of personal data that is processed, please find below the retention details and the reference to the relevant record of processing *[the data controller should indicate the relevant categories]*:

- All personal data related to the organisation and management of the *[meeting or event]* (this includes the information given during the registration, before, during or after the event) will be deleted **two years** after the last action in relation to the *[meeting or event]*.
- Sensitive personal data relating to dietary and/or access requirements will be deleted as soon as they are no longer necessary for the purpose for which they have been collected in the framework of the *[meeting or event]*, but no later than within **1 month** after the last action where the data is needed is completed.
- Recordings from the web-streamed *[meeting or event]* will be kept for **2 years** before being deleted. More information is available in the Record of Processing DPR-EC-00306 (Web-streaming of Commission events).
- In case of audio-visual recording of the *[meeting or event]*, the recordings will be kept for **2 years** after the *[meeting or event]* before being deleted. More information is available in the Record of Processing DPR-EC-01937 (Audio-visual recording of meetings).
- In case of individual and/or group photographs or videos of the *[meeting or event]*, the recordings will be kept for **2 years** after the *[meeting or event]* before being deleted.
- Personal data shared with the ELA Human Resources and Security Team for the participants to gain access to ELA premises is kept **for 6 months** after the termination of the link between the data subject and the European Labour Authority. More information is available in Record of Processing: “DPR-ELA-2022-0008: ELA access control and CCTV system.”
- Personal data shared with the controller for future mailing purposes (e.g., for receiving newsletters or invitations to similar events) are processed in line with the Record “DPR-ELA-2022-0024 ELA Contact lists & network partners databases”.
- Selected service providers for organisational purposes (such as caterers, travel agents or event management organisations) are contractually bound to process personal data on behalf of and in line with the instructions of the data controller, keep confidential any data they process and protect it from unauthorised access, use and retention.

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.

[If the controller foresees the publication of any personal data, it should specify to what extent it would publish personal data and the legal basis for it (e.g. consent).]

When explicitly agreed by you, some of your personal data (publications of minutes, reports, powerpoint presentations or relevant documentation used during meetings, name and affiliation of participants and /or speakers) will be published on a publicly available website or printed to illustrate communication material, photo albums, etc.

For digital events, the privacy statements of the platforms and tools used to organise and manage the event, apply.

[If the data controller intends to transfer personal data to recipients in a third country or international organisation, it should indicate:

The *(Name of the Unit/team responsible for the event/meeting)* will transfer your personal data to the following recipients in a third country or to an international organisation in accordance with Regulation (EU) 2018/1725: *[the data controller should indicate all categories of recipients, except for EC staff.]*

The *(Name of the Unit/team responsible for the event/meeting)* will transfer your personal data based on *[the data controller should specify the legal ground for the transfer by selecting the relevant paragraph below as applicable]*

- *adequacy decision of the Commission for a specific country² / commercial sector (Article 47 of Regulation (EU) 2018/1725) [or in the absence of this],*

² The European Commission has so far recognised Andorra, Argentina, Canada (commercial organisations), Faroe Islands, Guernsey, Israel, Isle of Man, Japan, Jersey, New Zealand, Switzerland, Uruguay and the United States of America (limited to the Privacy Shield framework) as providing adequate protection on personal data protection.

- *your expressed consent even if no adequacy decision and no appropriate safeguards have been set up (according to article 47 and 48 of Regulation 2018/1725).*

Please note that pursuant to Article 3(13) of Regulation (EU) 2018/1725 public authorities (e.g. Court of Auditors, EU Court of Justice) which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients. The further processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing.

[If applicable, a specific clause about investigations, including legal requests from public authorities, should be included.]

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.

[If the controller has indicated under Heading 3 (legal grounds for processing) that the processing is lawful pursuant to Article 5(1)(a) of the Regulation, i.e. that your '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', please include the following text:

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.

[If the controller has indicated under Heading 3 that the processing is lawful, because it is based on CONSENT of the data subjects (Article 5(1)(d)), then include:

You have consented to provide your personal data to *[indicate the name of the Unit/team responsible for the event/meeting, i.e. the organisational entity]* for the present processing operation. You can withdraw your consent at any time by notifying the Data Controller. The withdrawal will not affect the lawfulness of the processing carried out before you have withdrawn the consent.

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, [*indicate controller entity, and (ONLY) functional mailbox*)].

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

You may contact the Data Protection Officer (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) 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 (ELA DPO) publishes the register of all processing operations on personal data by ELA, which have been documented and notified to her. 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-2022-0023: ELA live, hybrid and digital events, seminars, workshops, conferences, meetings, open/celebration/information days and visits.