European Labour Authority
DATA PROTECTION OFFICER

RECORD OF PROCESSING OPERATIONS ON PERSONAL DATA

DPR-ELA-2022-0042: ELA ICT Ticket system
1 PART 1: PUBLIC - RECORD (ARTICLE 31)

1.1 GENERAL INFORMATION

<table>
<thead>
<tr>
<th>Record reference</th>
<th>DPR-ELA-2022-0042</th>
</tr>
</thead>
<tbody>
<tr>
<td>Title of the processing operation</td>
<td>ELA ICT Ticket system</td>
</tr>
<tr>
<td>Controller entity</td>
<td>European Labour Authority, ICT and facilities, ICT Team</td>
</tr>
<tr>
<td>Joint controllers</td>
<td>☒ N/A ☐ YES, fill in details below</td>
</tr>
<tr>
<td>Processor(s)</td>
<td>Description of the main responsibilities of each of the controllers, and the essence of the Joint controllership arrangements.</td>
</tr>
<tr>
<td>Internal organisation(s)/entity(ies) Names and contact details</td>
<td>☒ N/A ☐ YES</td>
</tr>
<tr>
<td>External organisation(s)/entity(ies) Names and contact details</td>
<td>☐ N/A ☒ YES</td>
</tr>
<tr>
<td><strong>Data Protection Officer</strong> Name and contact details</td>
<td>Laura NUNEZ BAREZ Landererova 12, 811 09 Bratislava I Slovakia Email: <a href="mailto:data-protection@ela.europa.eu">data-protection@ela.europa.eu</a></td>
</tr>
<tr>
<td>Corporate Record</td>
<td>☐ Yes ☒ No</td>
</tr>
<tr>
<td>Language of the record</td>
<td>English</td>
</tr>
<tr>
<td>Record Model</td>
<td>☐ N/A</td>
</tr>
</tbody>
</table>

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1 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

The European Labour Authority, ICT and facilities team (ELA ICT Team) maintains an ICT ticketing system that is used to register all requests from ELA users for ICT services, including; requests for ICT equipment, repairs and configuration of existing equipment and interventions by the ELA ICT Helpdesk. Requests by users are normally made in the system automatically using the functional email account: ithelpdesk@ela.europa.eu

Alternatively requests may be added manually by staff of the ELA ICT Helpdesk.

Requests are logged in the system by the user’s name and email address. The ELA ICT ticket system allows the status of user requests for ICT work to be monitored and allocated appropriately to ICT support staff. Tickets are closed by the ELA ICT Helpdesk on resolution of the problem or delivery of the service/equipment. The purpose of this processing of personal data is to implement an efficient & secure ICT environment for all persons working at ELA.

1.2.2 Processing for further purposes

☐ Archiving in the public interest
☐ Scientific or historical research purposes
☒ Statistical purposes
☐ N/A

Safeguards in place to ensure data minimisation
☐ Pseudonymisation
☐ Any other, specify

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

   Generation of automatic email responses to users following receipt of request.
   Additional automatic responses to users on resolution or re-allocation of ticket.
   Entries to the Ticketing system may be manually input by members of the ELA ICT group, including allocation to requesting person.
   Closure of tickets.
   Requests for additional information.
   Re-allocation of ticket to another ELA ICT staff.

2. ☒ Manual processing
   a. ☒ Word documents
   b. ☒ Excel sheet
   c. ☐ Any other, specify

3. ☐ Any other mode, specify

1.2.4 Storage medium

1. ☐ Paper
2. ☒ Electronic
3. ☒ External contractor premises
4. ☐ Others, specify

Description:
Internal Helpdesk is provided by CANCOM.
M365 Support is provided by ORAMIX.
ELA ICT could also request support direct to Microsoft and Microsoft will be able to contact users
direct, if ELA ICT assign the tickets directly to them.

1.2.5 Comments on the processing of the data
The information in the ticket system may be used to generate performance indicators & monitor the
efficiency of the Help Desk ICT service, but not individual persons. Part of the implementation of an
efficient & secure ICT environment for all persons working at ELA. The ICT service receives thousands of
requests from staff per year, which need to be registered and followed up individually. This is only
possible by recording the requests in an ICT ticket system. Incidents may be retained for trend analysis,
to identify persistent and recurrent problems. The registration of incidents in such a system also allows
the generation of standard performance indicators, by which the ICT service can quantify the service
level that it achieves.

1.3 DATA SUBJECTS AND DATA CATEGORIES

1.3.1 Data subjects’ categories

<table>
<thead>
<tr>
<th>1. Internal to organisation</th>
<th>ELA Staff</th>
</tr>
</thead>
<tbody>
<tr>
<td>2. External to organisation</td>
<td>☒ N/A</td>
</tr>
</tbody>
</table>

1.3.2 Data categories/fields
Indicate the categories of data that will be processed

- User name (first name, last name)
- Email address.
- The subject of the ticket will be the incident reported by the end user.
- Log files.

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

If applicable, indicate the reasons under article 10(2) allowing the processing of the special categories of data:

(a) ☐ The data subject has given explicit consent to the processing of those personal data for one or more specified purposes, [...].
(b) ☐ Processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security [...].
(c) ☐ Processing is necessary to protect the vital interests of the data subject or of another person where the data subject is physically or legally incapable of giving consent.
(d) ☐ Processing is carried out in the course of its legitimate activities with appropriate safeguards by a non-profit-seeking body which constitutes an entity integrated in a Union institution or body and with a political, philosophical, religious or trade-union aim [...].
(e) ☐ Processing relates to personal data which are manifestly made public by the data subject.
(f) ☐ Processing is necessary for the establishment, exercise or defense of legal claims or whenever the Court of Justice of the European Union is acting in its judicial capacity.
(g) ☐ Processing is necessary for reasons of substantial public interest, [...].
(h) ☐ Processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services [...].
(i) ☐ Processing is necessary for reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health or ensuring high standards of quality and safety of health care and of medicinal products or medical devices [...].
(j) ☐ Processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes [...].
Data Subject information within the Ticket system

Reviewed daily by the Help Desk staff. During this process outstanding tickets are allocated to appropriate IT staff for further treatment. Furthermore, the Help Desk will delete ticket entries that have been resolved more than 6 months ago.

Log files entries containing "From" and "To" email message information

are retained on the Ticket system server for a maximum of 6 months.

Description

Changes and modifications will be done within 5 working days of request from data subject.

1.5 RECIPIENTS

<table>
<thead>
<tr>
<th>Origin of the recipients of the data</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. ☐ Within the EU organization</td>
</tr>
<tr>
<td>2. ☒ Outside the EU organization</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Categories of the data recipients</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. ☒ A natural or legal person</td>
</tr>
<tr>
<td>2. ☐ Public authority</td>
</tr>
<tr>
<td>3. ☐ Agency</td>
</tr>
<tr>
<td>4. ☐ Any other third party, specify</td>
</tr>
</tbody>
</table>

Description

Processing is restricted to the ELA ICT Team and external contractors (depending on the topic of the consultation): CANCOM (ICT Helpdesk), ORAMIX (M365 Support), and Microsoft staff if tickets are assigned to them.

1.6 INTERNATIONAL DATA TRANSFERS

<table>
<thead>
<tr>
<th>Transfer to third countries or international organisations of personal data</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Transfer outside of the EU or EEA</td>
</tr>
<tr>
<td>☒ N/A, transfers do not occur and are not planned to occur</td>
</tr>
<tr>
<td>☐ YES,</td>
</tr>
<tr>
<td>Country(ies) to which the data is transferred</td>
</tr>
<tr>
<td>2. Transfer to international organisation(s)</td>
</tr>
<tr>
<td>☒ N/A, transfers do not occur and are not planned to occur</td>
</tr>
<tr>
<td>☐ Yes, specify further details about the transfer below</td>
</tr>
</tbody>
</table>
### 3. Legal base for the data transfer

- Transfer on the basis of the European Commission’s **adequacy decision** *(Article 47)*
- Transfer subject to **appropriate safeguards** *(Article 48.2 and .3)*, specify:
  - (a) ☐ A legally binding and enforceable instrument between public authorities or bodies.
  - (b) ☐ Standard data protection clauses, adopted by
  - (c) ☐ The European Data Protection Supervisor and approved by the Commission, pursuant to the examination procedure referred to in Article 96(2).
  - (d) ☐ Binding corporate rules, ☐ Codes of conduct, ☐ Certification mechanism pursuant to points (b), (e) and (f) of Article 46(2) of Regulation (EU) 2016/679, where the processor is not a Union institution or body.
- 3. Subject to the authorisation from the European Data Protection Supervisor:
  - ☐ Contractual clauses between the controller or processor and the controller, processor or the recipient of the personal data in the third country or international organisation.
  - ☐ Administrative arrangements between public authorities or bodies which include enforceable and effective data subject rights.
- ☐ Transfer based on an **international agreement** *(Article 49)*, specify

### 4. Derogations for specific situations *(Article 50.1 (a) –(g))*

- ☒ N /A
- ☐ Yes, derogation(s) for specific situations in accordance with article 50.1 (a) –(g) apply (ies).

In the absence of an adequacy decision, or of appropriate safeguards, transfer of personal data to a third country or an international organisation is based on the following condition(s):

- (a) ☐ The data subject has explicitly consented to the proposed transfer, after having been informed of the possible risks of such transfers for the data subject due to the absence of an adequacy decision and appropriate safeguards
- (b) ☐ The transfer is necessary for the performance of a contract between the data subject and the controller or the implementation of pre-contractual measures taken at the data subject’s request
- (c) ☐ The transfer is necessary for the conclusion or performance of a contract concluded in the interest of the data subject between the controller and another natural or legal person
- (d) ☐ The transfer is necessary for important reasons of public interest
- (e) ☐ The transfer is necessary for the establishment, exercise or defense of legal claims
- (f) ☐ The transfer is necessary in order to protect the vital interests of the data subject or of other persons, where the data subject is physically or legally incapable of giving consent
- (g) ☐ The transfer is made from a register which, according to Union law, is intended to provide information to the public and which is open to consultation either by the public in general or by any person who can demonstrate a legitimate interest, but only to the extent that the conditions laid down in Union law for consultation are fulfilled in the particular case

### 1.7 INFORMATION TO DATA SUBJECTS ON THEIR RIGHTS

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

Publication of the privacy statement
☒ Published on website
Web location:
- ELA internal website ☒ (URL: Share point on personal data protection)
☒ Other form of publication, specify
Privacy Statement will be published on the internal space of ICT Team.

☒ 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.

Description:

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.