



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 31¹)**1.1 GENERAL INFORMATION**

| | |
|---|---|
| Record reference | DPR-ELA-2022-0042 |
| Title of the processing operation | ELA ICT Ticket system |
| Controller entity | European Labour Authority, ICT and facilities, ICT Team |
| Joint controllers | <input checked="" type="checkbox"/> N/A <input type="checkbox"/> YES, fill in details below |
| Processor(s) | Description of the main responsibilities of each of the controllers, and the essence of the Joint controllership arrangements. |
| Internal organisation(s)/entity(ies) Names and contact details | <input checked="" type="checkbox"/> N/A <input type="checkbox"/> YES |
| External organisation(s)/entity(ies) Names and contact details | <input type="checkbox"/> N/A <input checked="" type="checkbox"/> YES Microsoft Ireland South County Business Park, One Microsoft Place, Carmanhall and Leopardstown, Dublin, D18 P521, Ireland CANCOM Headquarters – Munich CANCOM SE / CANCOM GmbH Erika-Mann-Straße 69, 80636 München |
| Data Protection Officer Name and contact details | Laura NUNEZ BAREZ Landererova 12, 811 09 Bratislava I Slovakia Email: data-protection@ela.europa.eu |
| Corporate Record | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| Language of the record | English |
| Record Model | <input type="checkbox"/> N/A |

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

- 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
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**

| | |
|-----------------------------|---|
| 1. Internal to organisation | ELA Staff |
| 2. External to organisation | <input checked="" type="checkbox"/> N/A |

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,

| |
|--|
| <input type="checkbox"/> trade union membership, Or/and, <input type="checkbox"/> Genetic data, biometric data for the purpose of uniquely identifying a natural person, <input type="checkbox"/> Data concerning health, <input type="checkbox"/> Data concerning a natural person's sex life or sexual orientation. <input checked="" type="checkbox"/> 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 [...].

Additional information

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"/> Yes <input type="checkbox"/> |
| Description: | |

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 |
| | | | |

| | | | |
|--|--|--|--|
| 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

| Origin of the recipients of the data | |
|--|--|
| 1. <input type="checkbox"/> Within the EU organization | N/a |
| 2. <input checked="" type="checkbox"/> Outside the EU organization | External contractors/ processors of this process: Microsoft, CANCOM and ORAMIX |

| Categories of the data recipients |
|--|
| 1. <input checked="" type="checkbox"/> A natural or legal person |
| 2. <input type="checkbox"/> Public authority |
| 3. <input type="checkbox"/> Agency |
| 4. <input type="checkbox"/> Any other third party, specify |

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

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

| | |
|---|--|
| Names of the international organisations to which the data is transferred | |
| <p>3. Legal base for the data transfer</p> <p><input type="checkbox"/> Transfer on the basis of the European Commission's adequacy decision (<i>Article 47</i>)</p> <p><input type="checkbox"/> Transfer subject to appropriate safeguards (<i>Article 48.2 and .3</i>), specify:</p> <p>2. (a) <input type="checkbox"/> A legally binding and enforceable instrument between public authorities or bodies.</p> <p>Standard data protection clauses, adopted by</p> <p>(b) <input type="checkbox"/> the Commission, or</p> <p>(c) <input type="checkbox"/> the European Data Protection Supervisor and approved by the Commission, pursuant to the examination procedure referred to in Article 96(2) .</p> <p>(d) <input type="checkbox"/> Binding corporate rules, <input type="checkbox"/> Codes of conduct , <input type="checkbox"/> 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.</p> <p>3. Subject to the authorisation from the European Data Protection Supervisor:</p> <p><input type="checkbox"/> 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.</p> <p><input type="checkbox"/> Administrative arrangements between public authorities or bodies which include enforceable and effective data subject rights.</p> <p><input type="checkbox"/> Transfer based on an international agreement (<i>Article 49</i>), specify</p> | |
| <p>4. Derogations for specific situations (<i>Article 50.1 (a) –(g)</i>)</p> <p><input checked="" type="checkbox"/> N /A</p> <p><input type="checkbox"/> Yes, derogation(s) for specific situations in accordance with article 50.1 (a) –(g) apply (ies).</p> <p>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):</p> <p>(a) <input type="checkbox"/> 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</p> <p>(b) <input type="checkbox"/> 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</p> <p>(c) <input type="checkbox"/> 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</p> <p>(d) <input type="checkbox"/> The transfer is necessary for important reasons of public interest</p> <p>(e) <input type="checkbox"/> The transfer is necessary for the establishment, exercise or defense of legal claims</p> <p>(f) <input type="checkbox"/> 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</p> <p>(g) <input type="checkbox"/> 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</p> | |

1.7 INFORMATION TO DATA SUBJECTS ON THEIR RIGHTS

Rights of the data subjects

Article 17 – Right of access by the data subject

Article 18 – Right to rectification

Article 19 – Right to erasure (right to be forgotten)

Article 20 – Right to restriction of processing

Article 21 – Notification obligation regarding rectification or erasure of personal data or restriction of processing

Article 22 – Right to data portability

Article 23 – Right to object

Article 24 – Rights related to Automated individual decision-making, including profiling

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)
- External website (URL: <https://www.ela.europa.eu/en/privacy-policy>)

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.