



**European Labour Authority**

DATA PROTECTION OFFICER

**RECORD OF PROCESSING OPERATIONS ON PERSONAL DATA**

DPR-ELA-2022-0038 ELA Cybersecurity campaigns

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

<b>Record reference</b>	DPR-ELA-2022-0038
<b>Title of the processing operation</b>	ELA Cybersecurity campaigns
<b>Controller entity</b>	European Labour Authority, Resources Unit, ICT and Facilities Team (ELA IT 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>Internal organisation(s)/entity(ies)</b>	<input checked="" type="checkbox"/> N/A <input type="checkbox"/> YES
<b>External organisation(s)/entity(ies)</b> Names and contact details	<input type="checkbox"/> N/A <input checked="" type="checkbox"/> YES The Computer Emergency Response Team (CERT-EU).  Rue de la Loi 107 1000 Brussels, Belgium
<b>Data Protection Officer</b> Name and contact details	Laura NUNEZ BAREZ Landererova 12, 811 09 Bratislava I Slovakia Email: data-protection@ela.europa.eu
<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

The purpose of processing is to contribute to the security of the ICT infrastructure of the European Labour Authority (ELA), with the support of the Computer Emergency Response Team (CERT-EU).

CERT-EU's mission is to contribute to the security of the ICT infrastructure of all Union institutions, bodies and agencies by helping to prevent, detect, mitigate and respond to cyber-attacks and by acting as their cyber-security information exchange and incident response coordination hub.

CERT-EU collects, manages, analyses and shares information with the constituents on threats, vulnerabilities and incidents on unclassified ICT infrastructure. It coordinates responses to incidents at inter-institutional and constituent level, including by providing or coordinating the provision of specialised operational assistance.

### 1.2.2 Processing for further purposes

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

During the execution of the campaigns, CERT-EU can provide screenshots from the dashboard of their platform about overview actions (emails sent, opened, links clicked and data submitted). Upon request, CERT-EU can provide the raw data from the different campaigns, in case reports and statistics would be foreseen.

2.  Manual processing
  - a.  Word documents
  - b.  Excel sheet
  - c.  Any other, 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:****1.2.5 Comments on the processing of the data**

The transfer of personal data to is covered by an European Commission , DG Informatics (DIGIT) under Record "DPR-EC-07167 CERT-EU activities", available [here](#).

**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**

First name, Surname, E-mail, Department (short name).

Aggregated data regarding the emails sent, opened, links clicked and data submitted.

**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

**Additional information****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
All data categories	Data will be destroyed 15 days after the campaign is finalised.		

**1.5 RECIPIENTS**

Origin of the recipients of the data	
1. <input checked="" type="checkbox"/> Within the EU organization	ELA Resources Unit
2. <input checked="" type="checkbox"/> Outside the EU organization	CERT- EU

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**

Authorised staff from ELA Resources Unit will have access to all data categories.  
CERT-EU staff working on the specific campaign will have access to all data categories.  
Statistical reports with aggregated data will be prepared for educational purposes.

**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> <input checked="" type="checkbox"/> N/A, transfers do not occur and are not planned to occur <input type="checkbox"/> YES,
<b>2. Transfer to international organisation(s)</b> <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
<b>3. Legal base for the data transfer</b> <input type="checkbox"/> Transfer on the basis of the European Commission's <b>adequacy decision</b> (Article 47) <input type="checkbox"/> Transfer subject to <b>appropriate safeguards</b> (Article 48.2 and .3), specify: <ol style="list-style-type: none"> <li>2. (a) <input type="checkbox"/> A legally binding and enforceable instrument between public authorities or bodies. Standard data protection clauses, adopted by</li> <li>(b) <input type="checkbox"/> the Commission, or</li> </ol>

(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.

#### 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

#### Description

### 1.7 INFORMATION TO DATA SUBJECTS ON THEIR RIGHTS

<b>Rights of the data subjects</b>
<i>Article 17 – Right of access by the data subject</i>
<i>Article 18 – Right to rectification</i>
<i>Article 19 – Right to erasure (right to be forgotten)</i>
<i>Article 20 – Right to restriction of processing</i>
<i>Article 21 – Notification obligation regarding rectification or erasure of personal data or restriction of processing</i>
<i>Article 22 – Right to data portability</i>
<i>Article 23 – Right to object</i>
<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: SharePoint on Personal Data Protection )
- External website  (URL: <https://www.ela.europa.eu/en/privacy-policy> )

Other form of publication, specify

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:

Guidance on data subjects' rights available on ELA main website.

### 1.8 SECURITY MEASURES

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

#### Description:

An encrypted email will be sent to CERT-EU with the information needed.