



**European Labour Authority**

DATA PROTECTION OFFICER

**RECORD OF PROCESSING OPERATIONS ON PERSONAL DATA**

DPR-ELA-2023-0011 Publication of meetings with interest representatives and other externals

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

**1.1 GENERAL INFORMATION**

<b>Record reference</b>	DPR-ELA-2023-0011
<b>Title of the processing operation</b>	Publication of meetings with interest representatives and other externals
<b>Controller entity</b>	European Labour Authority, Governance Unit
<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) Names and contact details</b>	<input checked="" type="checkbox"/> N/A <input type="checkbox"/> YES
<b>External organisation(s)/entity(ies) Names and contact details</b>	<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  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.
<b>Data Protection Officer Name and contact details</b>	Laura NUNEZ BAREZ European Labour Authority 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 European Labour Authority aims to manage and make public information on meetings held by the Executive Director, Chair and Deputy Chair of the Management Board and Heads of Unit of the European Labour Authority.

The European Labour Authority processes personal data in order to fulfil its transparency obligations.

**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

**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
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

**1.3 DATA SUBJECTS AND DATA CATEGORIES**

**1.3.1 Data subjects' categories**

1. Internal to organisation	Executive Director of the European Labour Authority Chair and Deputy Chair of the Management Board and Heads of Unit of the European Labour Authority (or staff members replacing them)
2. External to organisation	Interest representatives and other external ( <i>in the sense of the Decision No 03/2023 of 14 April 2023 of the Executive Director on the</i>

	<i>publication of information on meetings with interest representatives and other externals</i> <sup>1</sup>
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### 1.3.2 Data categories/fields

Indicate the categories of data that will be processed:

The information to be made public shall consist of:

- a) the names of representatives of organisations and Agency’s officials (other than the Executive Director) attending the meetings,
- b) date of the meeting,
- c) the location,
- d) the name of the organisation of the interest representative or any other organisation of an external party present at the meeting,
- e) the function of ELA’s representative attending the meeting (e.g. Head of Unit Governance and Coordination),
- f) the subject of the meeting.

The names of the individuals (acting on behalf of organisations, self-employed individuals or externals) or the Agency’s officials (other than the Executive Director) attending the meetings shall not be made public unless they have unambiguously and freely given their consent.

#### 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.

#### Description:

Trade union membership may be collected due to the activities of the Authority. In most of the cases, Regulation (EU) 2019/1149 of 20 June 2019 establishing a European Labour Authority (ELA Regulation) foresees the intervention of representatives of trade union and employer organisations’ members.

<sup>1</sup> b) ‘Interest representative’ means any natural or legal person, formal or informal group, association or network, organisation or individual, irrespective of their legal status, engaged in activities carried out with the objective of directly or indirectly influencing the implementation the Authority’s mandate, irrespective of where these activities are undertaken and of the channel or medium of communication used.

‘Other external’ means any external party which is not excluded under paragraph (b) above, and which has an interest in or is potentially directly or indirectly influenced by the activities of ELA.

**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 [...].

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

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

<b>Data category</b>	<b>Retention period</b>
All data categories	3 years After the end of this retention period, anonymised information might be digitally archived for permanent preservation, for historical purposes.

**1.5 RECIPIENTS**

<b>Origin of the recipients of the data</b>	
1. <input type="checkbox"/> Within the EU organization	
2. <input checked="" type="checkbox"/> Outside the EU organization	General public

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

**Description**

The lists of meetings held by the Executive Director, Chair and Deputy Chair of the Management Board and Heads of Unit with interest representatives, are published online and are therefore available to the general public.

**1.6 INTERNATIONAL DATA TRANSFERS**

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

**Description**

Personal data published on a publicly available website (such as europa.eu) are accessible worldwide.

**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>
<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

Privacy Statement will be sent to the data subjects with the invitation.

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 how to exercise data subjects' rights is available on ELA main website: [here](#).

## 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.