



European Labour Authority

DATA PROTECTION OFFICER

RECORD OF PROCESSING OPERATIONS ON PERSONAL DATA

DPR-ELA-2023-0003 ELA interactive online training platform for Concerted and Joint Inspections

1 PART 1: PUBLIC - RECORD (ARTICLE 31¹)**1.1 GENERAL INFORMATION**

Record reference	DPR-ELA-2023-0003
Title of the processing operation	ELA interactive online training platform for Concerted and Joint Inspections
Controller entity	European Labour Authority, Enforcement and Analysis Unit
Joint controllers	<input checked="" type="checkbox"/> N/A <input type="checkbox"/> YES, fill in details below
Processor(s)	<input type="checkbox"/> N/A <input checked="" type="checkbox"/> YES, fill in details below
Internal organization(s)/entity(ies) Names and contact details	<input checked="" type="checkbox"/> N/A <input type="checkbox"/> YES
External organization(s)/entity(ies) Names and contact details	<input type="checkbox"/> N/A <input type="checkbox"/> YES PricewaterhouseCoopers Auditing Ltd. Bajcsy-Zsilinszky út 78, 1055 Budapest Hungary
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

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 Enforcement and Analysis Unit of the European Labour Authority (ELA) provides specialized training to effectively carry out concerted and joint cross-border inspections in order to promote a consistent enforcement of Union law in the area that is operated by the Authority.

In this particular case, ELA and MS employees will have access to a software-based learning management system, provided by an external contractor. The system does not require the direct link to personal data, but to data to:

- Grant access to the specific platform
- Provide training material and e-learning

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 minimization

- Pseudonymization
- 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

Link to an external training platform provided by the external contractor.

- a. Excel sheet
- b. Any other, specify

2. Any other mode, specify

Online training platform supported by SCORM packages.

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

1.2.5 Comments on the processing of the data

Online (interactive) training platform:

The external contractor will receive the names of the candidates, but not their CVs. This contractor will also receive the email address of each of the current registered participants in order to send them a login and a password that enables access. At this stage, users will receive the link to ELA web site with the privacy statement for accessing.

Regarding specific training: The tenderer will provide the link to ELA, and ELA will send it to the member states enforcement authorities, and these will designate the trainees that will have access to the online interactive training platform.

1.3 DATA SUBJECTS AND DATA CATEGORIES

1.3.1 Data subjects' categories

1. Internal to	ELA staff
2. External to	Officials from national authorities Special advisers from Member States

1.3.2 Data categories/fields

Indicate the categories of data that will be processed:

For the online/hybrid training:

Name, surname, organization, role/position, email address and country.

Their activity in the course will be monitored and a certification of attendance will be provided after its completion.

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

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"/>
--	---

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
Data categories related to the participants	Will be kept for maximum one year after the specific training take place. After this year only aggregated data will be kept.

1.5 RECIPIENTS

Origin of the recipients of the data	
1. <input checked="" type="checkbox"/> Within the EU organization	Staff of the Enforcement and Analysis Unit
2. <input checked="" type="checkbox"/> Outside the EU organization	Staff of the external contractor Line managers of the external applicants

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

ELA staff on the Enforcement and Analysis Unit will have access to the participants data on an “*a need-to-know basis*”.

Line managers will have access to their staff data and the status of the training (completed or not) .

External contractors will have access to the list of participants and their email in order to grant access to their training platform.

1.6 INTERNATIONAL DATA TRANSFERS

Transfer to third countries or international organizations 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,
2. Transfer to international organization(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

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 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

External providers' website.

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:

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 organizational measures. Technical measures include appropriate actions to address online security, risk of data loss, alteration of data or unauthorized access, taking into consideration the risk presented by the processing and the nature of the personal data being processed. Organizational measures include restricting access to the personal data solely to authorized persons with a legitimate need to know for the purposes of this processing operation.