



**European Labour Authority**

DATA PROTECTION OFFICER

**RECORD OF PROCESSING OPERATIONS ON PERSONAL DATA**

DPR-ELA-2022-0026.2: Social Media Use by the European Labour Authority

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

**1.1 GENERAL INFORMATION**

<b>Record reference</b>	DPR-ELA-2022-0026
<b>Title of the processing operation</b>	Social Media Use by the European Labour Authority
<b>Controller entity</b>	European Labour Authority, Governance and Coordination Unit, Communications Team (ELA Communications Sector)
<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  <b>Ecorys Europe EEIG-GEIE</b> Rue Belliard 12 1040 Brussels Belgium  ELA staff are provided with the MS O365 Office products to be able to access work documents from different devices and locations, and to carry out ELA's tasks. In this case, the processor will be:  Microsoft Ireland South County Business Park, One Microsoft Place, Carmanhall and Leopardstown, Dublin, D18 P521, Ireland.
<b>Data Protection Officer Name and contact details</b>	Laura NUNEZ BAREZ Landererova 12, 811 09 Bratislava I Slovakia Email: data-protection@ela.europa.eu
<b>Corporate Record</b>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<b>Language of the record</b>	English

<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

Social media is used in the European Labour Authority (ELA) to inform the social media audience about ELA policies and activities, raise awareness about the ELA initiatives and engage directly with citizens and general audience by replying to their comments and questions.

The European Labour Authority collects and uses personal information to understand how social media users discuss its policies and initiatives. For this purpose, we process and analyse only publicly available data from posts by authors that have agreed to the terms and conditions of the various social media platforms that the ELA uses, in particular: Twitter, LinkedIn, Youtube, EU Voice, EU Video and Facebook. Data gathered through social media is used for the following activities:

- a. **Engaging:** acquiring knowledge of the audience's questions and responding to them;
- b. **Targeting and advertising:** expanding the number of audiences aware of EU policies and engagement opportunities (for instance participation in the EU policy making);
- c. **Identifying and collaborating with influencers** (defined by reach, number of followers, engagement and topic) who can be multipliers of the ELA's activities;
- d. **Reporting and optimisation:** analysing the performance of posts and allowing ELA's social media communication and engagement to improve and
- e. **Media monitoring tools:** The ELA does not use of any external social media monitoring tools. When monitoring ELA social media accounts, the ELA relies solely on the analytics built in the platforms and on statistics available publicly such as number of likes under a post. Social media users who interact with the ELA (for example commenting the ELA posts) do so after having agreed to the policies of those platforms.

As part of the targeting and advertising ELA's activities, the Communications Sector uses the LinkedIn Lead Gen Forms to improve the interactions with external citizens interested in ELA mandate, objectives and activities.

### 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
2.  Manual processing
  - a.  Word documents
  - b.  Excel sheet
3.  Any other mode, specify

Social media platforms are separate controllers for the personal data they process. To learn more on how the following social media platforms process your data, we encourage you to read the privacy policies of:

- LinkedIn
- Twitter
- YouTube

**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

**Description:**

Manual processing of the data and use of excel tables to monitor and follow up the request. ELA staff are provided with the MS O365 Office products to be able to access work documents from different devices and locations, and to carry out ELA's tasks.

**1.2.5 Comments on the processing of the data**

The social media database used by the Data Controller is a centralized solution that accumulates non-personal data obtained in the course of the social media monitoring and related communication activities. The database is used for the purpose of qualitative media monitoring analysis and reporting. The database is hosted on a cloud storage solution provided by Microsoft.

**1.3 DATA SUBJECTS AND DATA CATEGORIES**

**1.3.1 Data subjects' categories**

1. Internal to organisation	<input checked="" type="checkbox"/> Yes Internal to the organisation (staff members of the ELA who engage on social media platforms)
2. External to organisation	<input checked="" type="checkbox"/> Yes External to the organisation (any natural person, external to the ELA, who engages on social media platforms, e.g. staff of other EU institutions, agencies or bodies, journalists, citizens).

**1.3.2 Data categories/fields**

Personal data derived from the user profiles:

- Identification data (name, username, user identification and geographical area)
- Personal characteristics (age, gender, family status, native language, nationality)
- Professional and educational background (occupation, company/organization, employment history, academic record, publications)
- Pictures and videos
- Engagement (amount of likes, favourites, comments, shares of users on a specific topic)

When using LinkedIn lead Gen Forms, the Communications Sector will receive user's LinkedIn profile when they interact with the specific event promoted.

Personal data available about users of social media platforms through their networks and connections

- Reach
- Sentiments
- Comments
- Shares of users on a specific topic
- Networks and connections

Data from public figures

(including European actors such as Members of the European Parliament on their public statements about EU topics or on ELA’s activities or previous European Union Institutions mandated staff)

Any other information published on a website that is analysed or on a third-party platform.

Personal data available via audiovisual content that might be published on the social media platforms:

Information in or about the content provided by a user (e.g. metadata), such as the location of a photo or the date a file was created, voice recordings, video recordings, or an image of a data subject;

However, data from the social media platforms is not saved on any other systems that ELA uses. The data is only accessed via those social media platforms. Only aggregated data is being saved on ELA systems e.g. number of visitors, clicks, likes etc., their geographical location etc.

While the external providers collect the personal data listed above, ELA Communications Team only analyses and uses aggregated data. However, individual quotes may be captured as examples and used to describe the general attitude towards the European Union and or the ELA in social media. These quotes are anonymised by removing the profile picture and name, except when they are by public figures, or individuals who publish posts about the European Union/ the ELA in their professional capacity or by influencers.

**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**

**Description:**

The process of digital photographs of individuals is not automatically biometric data even if they are used for identification purposes. Although a digital image may allow for identification using physical characteristics, it only becomes biometric data a “specific technical processing” is carried out.

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

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

Data category	Retention period
Personal data derived from the user profiles and related personal data available through the users' networks and connections	After initially being processed by the Data Controller or its processors personal data may be stored for a maximum period of 5 (five) years or, until a user deletes a social media account. Only aggregated and numeric values for performance measurement will be stored by the Data Controller in order to preserve capability to provide reports.
Personal data available via audiovisual content	Selected audiovisual content may be archived for permanent preservation, in line with the provisions of the European Labour Authority Filing plan and specific retention list, for historical purposes to document, preserve and make available the history and audiovisual heritage of the European Labour Authority and the European Union.
All paper and electronic records concerning the day-to-day correspondence, calls for proposals and/or interest together with the resulting contractual/financial files as well as reports containing aggregated data	will be archived according to ELA Retention List and stored in ARES (Advanced Records System) under the responsibility of the European Commission, Secretariat-General (see Record DPR-EC-00536 / Management and (short- and medium-term) preservation of Commission documents) for a period of ten (10) years with the application of sampling and selection techniques.

**Description**

Personal data will be kept for as long as the follow-up actions are necessary with regard to the purpose(s) of the processing of personal data. Data older than the defined retention periods will be either removed or copied to an alternate system to be made anonymous and aggregated for statistical purposes.

Specific retention period could apply to audio/visual recording of ELA events. The specific retention period would be described in the correspondent privacy statement. Selected audiovisual content may be archived for permanent preservation, in line with the provisions of the European Labour Authority Filing plan and specific retention list, for historical purposes to document, preserve and make available the history and audiovisual heritage of the European Labour Authority and the European Union.

**1.5 RECIPIENTS**

Origin of the recipients of the data	
1. <input checked="" type="checkbox"/> Within the EU organization	All ELA Staff
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 type="checkbox"/> Any other third party, specify	

**Description**

Access to the personal data collected for the processing operation in question is provided to the authorised personnel of the European Labour Authority and its contractors responsible for carrying out this processing operation according to the “need to know” principle. Such staff abide by statutory and, when required, additional confidentiality agreements. Authorised staff of the ELA Communications Team have access to the aggregated data provided by the users of social media platforms and related personal data available through their networks and connections, including any other information published on a website or on a third-party platform that is being analysed.

The information being published on the ELA websites and Social media can be accessed by any person in the world using the Internet or subscribing to Internet notification services.

In order to protect users’ privacy, our social media buttons to connect to those services do not set cookies when our website pages are loaded on users’ devices, nor there is an immediate redirection of users to social media or other websites.

**1.6 INTERNATIONAL DATA TRANSFERS**

<b>Transfer to third countries or international organisations of personal data</b>
<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>
<p><b>3. Derogations for specific situations (Article 50.1 (a) –(g))</b></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>

The information being published on the ELA websites and Social Media can be accessed by any person in the world using the Internet or subscribing to Internet notification services.

**1.7 INFORMATION TO DATA SUBJECTS ON THEIR RIGHTS**

<b>Rights of the data subjects</b>
<p><i>Article 17 – Right of access by the data subject</i></p> <p><i>Article 18 – Right to rectification</i></p> <p><i>Article 19 – Right to erasure (right to be forgotten)</i></p> <p><i>Article 20 – Right to restriction of processing</i></p> <p><i>Article 21 – Notification obligation regarding rectification or erasure of personal data or restriction of processing</i></p> <p><i>Article 22 – Right to data portability</i></p> <p><i>Article 23 – Right to object</i></p> <p><i>Article 24 – Rights related to Automated individual decision-making, including profiling</i></p>

### 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 available in Communications intranet.

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 subject's rights is 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 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.