



**European Labour Authority**

DATA PROTECTION OFFICER

**RECORD OF PROCESSING OPERATIONS ON PERSONAL DATA**

DPR-ELA-2024-001 CIRCABC at the European Labour Authority

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

**1.1 GENERAL INFORMATION**

<b>Record reference</b>	DPR-ELA-2024-001
<b>Title of the processing operation</b>	CIRCABC at the European Labour Authority
<b>Controller entity</b>	European Labour Authority, Cooperation Support 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 <u>To grant access and create the CIRCABC group:</u> European Commission - Informatics (DIGIT.DDG.D.1).
<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>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

**CIRCABC** (Communication and Information Resource Centre for Administrations, Businesses and Citizens) is a web-based service provided by the European Commission that is also used in the European Labour Authority to create collaborative workspaces. It is divided into categories and interest groups, allowing members in those groups to share information and resources such as meeting documents, agendas, meetings summaries and recordings or presentations delivered during specific meetings.

The collected personal data shall only be used for managing memberships or contacting members of the specific interest Groups for which the member has requested and been granted access by the interest group administrator.

### 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
  - c.  Any other, specify
3.  Any other mode, specify

#### Description

No personal data is used for automated decision making as CIRCABC does not do any automated decision making (including profiling).

### 1.2.4 Storage medium

1.  Paper
2.  Electronic
  - a.  Digital (MS documents (Word, Excel, Powerpoint), Adobe pdf documents, Audiovisual/multimedia assets, Image files (.JPEG, .PNG, etc.))
  - b.  Databases
  - c.  Servers
  - d.  Cloud
3.  External contractor premises

**Description:**

The creation of an Interest Group has to be requested to the European Commission.

Once the group is created, the content and its activity will be under the responsibility of the European Labour Authority, internally by a designated group administrator.

The CIRCABC is covered by the record “[DPR-EC-01666 CIRCABC](#)”, controlled by the European Commission: Informatics (DIGIT.DDG.D.1). This record covers the service required to keep the CIRCABC platform up and running.

Access to CIRCABC is also managed and granted by DIGIT through EU Login portal (see below point 1.3.2). Once the person has access to CIRCABC, they can request to become members of a particular interest group. Once a request is made, such request is approved/refused by the designated group administrator.

In addition to the personal information processed by the CIRCABC platform itself (the subject of this record), there might be personal information being used within interest groups, for example in documents or messages exchanged between members of a specific interest group. Please refer to the privacy statement of the relevant interest group for more information.

The present record covers the personal information being used within interest groups, for example in documents or messages exchanged between members of a specific interest group.

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

Data is stored in a secured and protected database hosted by the Data Centre of the European Commission, the operations of which abide by the Commission's security decisions and provisions established by the Directorate of Security for this kind of servers and services. The database is accessed with login/password authentication through the HTTPS protocol.

**1.3 DATA SUBJECTS AND DATA CATEGORIES**

**1.3.1 Data subjects' categories**

1. Internal to organisation	Data subjects (CIRCABC users) are physical persons (ELA Staff) who register in order to participate to Interest Group activities. A unique user-id is provided to each user.
2. External to organisation	Data subjects (CIRCABC users) are physical persons (for example EU citizens, Staff of public administration etc.) who register in order to participate to Interest Group activities. A unique user-id is provided to each user.

**1.3.2 Data categories/fields**

The CIRCABC global user directory holds personal information as follows:

- Identity: Username (mandatory), First name, Last name, Email address
- Contact information (optional), Title, Job position, Organisation, Phone no., Postal address, Fax, URL address, open text field/Description
- Documents shared (File history: creator, date and metadata)
- Recordings of presentations/trainings
- Picture of user
- Interest Group(s)
- Access profile, Role (s), Calendar
- Members of the group
- Post(s) in forum: content date and hour.
- EU Login. This data provides a common way for users to register or be registered for access to a number of different European Institutions’ information systems or services through this

service developed by the European Commission. This process is covered by Record “[DPR-EC-03187 - Identity & Access Management Service \(IAMS\)](#)” and the purpose is to manage user populations and their rights in the context of IT systems. The main purpose is to ensure the appropriate level of security is applied in a consistent fashion across Commission IT services with the ability to identify the user of the service, authenticate that user, and / or determine his or her authorisations and roles within the context of their service.

The specific personal data collected will be specified in the relevant Privacy Statement. Each group should have a Privacy Statement related to it, depending to the specific options selected.

**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"/>
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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
All data categories	When the user do not belong to any active group (a group with no activity for 5 years becomes inactive), the user account is deleted <b>after one year</b> .  Each group leader can decide to delete the data <u>before</u> the above mentioned time period.

**Description**

This information is automatically deleted after the expiration of the retention period. The service will keep the data in the registry as long as the service is operational.

User profiles can also be deleted from CIRCABC upon request of the member.

The users can at any time manage the data that they have provided. This includes modifying, deleting or updating the data directly in the platform.

Users maintain their own personal data. Group Managers cannot modify them.

**1.5 RECIPIENTS**

Origin of the recipients of the data	
1. <input checked="" type="checkbox"/> Within the EU organization	Persons who have access to the data are: CIRCABC administrators Group Leaders Member managers
2. <input checked="" type="checkbox"/> Outside the EU organization	European Commission administrators

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  Specify who has access to which parts of the data:

Outside the organisation:

**EC Category administrators:** administer (create, manage, delete) Groups set in their category. Typically, at the European Commission, there is one category per DG or agency. They may grant or revoke membership of any interest group in their category.

Internal to the organisation:

**CIRCABC administrators:** administer every category of Group

**Group Leaders:** they manage documents and users in their groups. They may grant or revoke membership; they may contact users for purposes of their service.

**Member managers:** they only administer the directory service of their interest group. They grant or revoke membership. They may modify members' access rights in the interest group.

CIRCABC is an open platform, therefore, data recipients can be physical or legal person of all types. This depends on the access level of the CIRCABC user.

All data recipients can potentially (depending on the user access level) access to identity and contact information of other users.

**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. Derogations for specific situations</b> (Article 50.1 (a) –(g)) <input checked="" type="checkbox"/> N /A <input type="checkbox"/> Yes, derogation(s) for specific situations in accordance with article 50.1 (a) –(g) apply (ies).

**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 privacy statement attached to this record.

**Publication of the privacy statement**

Published on website

Web location:

- ELA internal website  (URL: Internal SharePoint on personal data protection )
- External website  (URL: [Privacy Policy at ELA’s main website](#) )

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.

Your data subjects’ rights are available at ELA’s 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.

In particular for this process:

Throughout this procedure only authorised people are attributed access rights and only on a "need-to-know" basis. Any possible security measure is taken to prevent any improper use of or unauthorized access to the electronic file. Procedure-related documents are kept in a secure environment.