



European Labour Authority

DATA PROTECTION OFFICER

RECORD OF PROCESSING OPERATIONS ON PERSONAL DATA

DPR-ELA-2023-0010 Subscription to ELA electronic newsletters and notifications via Newsroom

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

Record reference	DPR-ELA-2023-0010
Title of the processing operation	Subscription to ELA electronic newsletters and notifications via Newsroom
Controller entity	European Labour Authority, Governance Unit, Communication Sector
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 organisation(s)/entity(ies) Names and contact details	<input checked="" type="checkbox"/> N/A <input type="checkbox"/> YES
External organisation(s)/entity(ies) Names and contact details	<input type="checkbox"/> N/A <input checked="" type="checkbox"/> YES The European Commission, Directorate-General for Communications Networks, Content and Technology, DG CONNECT Commission européenne/Europese Commissie, 1049 Bruxelles/Brussel, BELGIQUE/BELGIË 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.
Data Protection Officer Name and contact details	Laura NUNEZ BAREZ European Labour Authority Landererova 12, 811 09 Bratislava I Slovakia Email: data-protection@ela.europa.eu
Corporate Record	<input checked="" type="checkbox"/> Yes <input 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**

This processing of personal data aims to establish and administer a list of email addresses to manage the existing newsletters and alerts in the European Labour Authority (ELA).

Subscribers can at any time unsubscribe to the relevant newsletter and/or alert.

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 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. ☒ Subscribe and unsubscribe functionalities
2. ☒ Manual processing
 - a. ☐ Word documents
 - b. ☐ Excel sheet
 - c. ☒ Via Newsroom tool

Description

The European Labour Authority will act as controller and the European Commission as data processor for this specific process of personal data.

The processor maintains a record of all data processing operations carried out on behalf of the controller, transfers of personal data, security breaches, responses to requests for exercising rights of people whose personal data is processed and requests for access to personal data by third parties. The controller has access to the personal data only via Newsroom tool via EU Login.

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:

All personal data in electronic format (e-mails, documents, databases, uploaded batches of data, etc.) are stored on the servers of the European Commission. All processing operations are carried out

pursuant to the Commission Decision (EU, Euratom) 2017/46, of 10 January 2017, on the security of communication and information systems in the European Commission.

1.2.5 Comments on the processing of the data

The data is accessible via EC Newsroom platform. This process of personal data is covered by the European Commission in the Record "[DPR-EC-00841 - Corporate Newsroom](#)".

Access to the platform is EU Login password-protected and accessible only to the assigned Editors. Editors are granted access to the tool by DG CONNECT upon request from the Controller.

1.3 DATA SUBJECTS AND DATA CATEGORIES

1.3.1 Data subjects' categories

1. Internal to organisation	ELA Staff (Communications Sector, assigned editors and internal ELA Staff subscribers to the newsletter(s) and alerts
2. External to organisation	External subscribers to the newsletter(s) and alerts

1.3.2 Data categories/fields

ELA editors

Name, Surname, EU-Login.

The EU Login is a separate process to properly identify users and grant the correct accesses. It belongs to the European Commission and is covered by Record "[DPR-EC-03187 - Identity & Access Management Service \(IAMS\)](#)".

Subscribers (internal or external): E-mails.

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
ELA editors' personal data	Personal data will be collected as long as the user has this role.
Email for subscriptions/alerts	<p>All personal data collected via Newsroom is kept as follows:</p> <ul style="list-style-type: none"> the subscriber consents to the processing and until the subscriber unsubscribes himself or herself or requests the controller to delete his/her account, or 5 years from the last interaction of the data subject with Newsroom. It is important to note that receiving a newsletter/notification is not considered an "interaction" for this purpose. "Interactions" are actions from the subscriber such as subscribing, confirming a subscription, updating a subscription, etc.

Description

The data subject can also ask for modifications of personal data or withdraw their consent at any time, by sending an email to the controller, and their data will be updated (or deleted) as soon as possible and no longer than 15 days after his/her request.

1.5 RECIPIENTS

Origin of the recipients of the data	
1. <input checked="" type="checkbox"/> Within the EU organization	Authorised Editors assigned by the Controller at the European Labour Authority
2. <input checked="" type="checkbox"/> Outside the EU organization	European Commission, DG CONNECT

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

Internal recipients have access to the list of subscribers, relevant documents, databases, uploaded batches of data, subscriptions/alerts.

External recipients have access to the personal data related to the ELA Editors, subscribers' email, topics of interest and the frequency of notifications.

1.6 INTERNATIONAL DATA TRANSFERS

Transfer to third countries or international organisations 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 organisation(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
3. Derogations for specific situations (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).

Description

There are no transfers of personal data to third countries or international organisations.

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

Guidance on data subjects' rights is available on ELA main 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:

Your rights at ELA are 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 personal data solely to authorised persons with a legitimate need to know for the purposes of this processing operation.