

PROTECTION OF YOUR PERSONAL DATA

This privacy statement provides information about the processing and the protection of your personal data.

Processing operation: ELA research and analysis activities supporting cooperation between Member States

Data Controller: The European Labour Authority, Cooperation and Support Unit

Record reference: DPR-ELA-2025-0004

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1. Introduction

The European Labour Authority (hereafter 'ELA') is committed to protect your personal data and to respect your privacy. ELA collects and further processes personal data pursuant to [Regulation \(EU\) 2018/1725](#) of the European Parliament and of the Council of 23 October 2018 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data (repealing Regulation (EC) No 45/2001).

This privacy statement explains the reason for the processing of your personal data, the way we collect, handle and ensure protection of all personal data provided, how that information is used and what rights you have in relation to your personal data. It also specifies the contact details of the responsible Data Controller with whom you may exercise your rights, the Data Protection Officer and the European Data Protection Supervisor.

The information in relation to processing operation '*Report on overview and analysis of Member States' tools, processes and procedures related to administration and issue of Portable Document A1 in situations of posting (Art. 12 of Regulation 883/2004)*' undertaken by the Cooperation and Support Unit is presented below.

2. Why and how do we process your personal data?

Purpose of the processing operation: European Labour Authority, Cooperation and Support Unit (ELA COP Unit) collects and uses your personal information to contribute to ensuring fair labour mobility across the Union and assist Member States and the Commission in the coordination of social security systems within the Union. To that end, ELA aims to carry out research on the different administrative cooperation practices, possibilities and challenges between Member States' competent authorities in relation to the field of labour mobility and social security coordination.

The scope of this study is limited to the digital tools, processes and procedures related to administration and issue of Portable Document A1 in situations of posting and in particular, it aims to:

- Compile an inventory of PD A1 digital tools, highlighting their main characteristics and innovative and effective examples.
- Provide an overview and analysis of posting assessment criteria, pointing out main trends, divergences and measure administrative burden.
- Outline existing control and verification mechanisms applied to ensure the legitimacy and accuracy of information in PD A1 application.

Your personal data will not be used for an automated decision-making including profiling.

3. On what legal ground(s) do we process your personal data

We process your personal data, because, according to Article 5(1)(d) you have given consent to the processing of your personal data for one or more specific purposes.

We do not process **special categories of personal data**, therefore Article 10 of the Regulation does not apply.

4. Which personal data do we collect and further process?

In order to carry out this processing operation the Cooperation and Support Unit collects the following categories of personal data:

- **Identification data:**

Name, surname, name of the competent authority, country and contact details (telephone, e-mail).

- **Interview data:**

Date of the interview, information provided during the interview relevant for the scope of the report.

- **Content related data:**

opinion/reply to thematic questions (i.e. general questions, national legislation and practices, main challenges, possibilities and good practices), contacts of other potential stakeholders to be interviewed.

- **Audio/Video recordings** of the interviews can be performed to ensure the verbatim record of what was said during the interview.

- **Consent form authorization, dated and signed.**

For photographs and/or audio- or video recordings a specific consent form will be provided to the data subjects.

Publication of some of the personal data, mainly opinions, may be done as part of the communication activities of ELA but only aggregated data will be published. In case personal data will be published, a specific consent from the data subject will be gathered. The provision of personal data is not mandatory.

5. How long do we keep your personal data?

The Cooperation and Support Unit only keeps your personal data for the time necessary to fulfil the purpose of collection or further processing, namely for:

All data categories related to the research: interviews, replies to questionnaires 2 years

Identification data: 2 years. Before this two years, the experts will be contacted by ELA in order to request their consent to be included in ELA.

Personal data published: Name, surname, role, organisation, opinion 5 years. A specific authorization form will be provided to the data subject to inform him/her and gather his/her consent.

Audio/video recording 1 year from the start of the study.

Personal data will be deleted or anonymised 2 years after the reception of the raw data from the external contractors (processors) to ELA.

External processors will delete all personal data related to this research project at the moment of the transmission of the data to ELA.

Identification data will be deleted in 2 years. Before this two years, the experts will be contacted by ELA in order to request their consent to be included in ELA. This process will be covered by Record “DPR-ELA-2022-0024 ELA Contact lists & network partners databases”

6. How do we protect and safeguard your personal data?

All personal data in electronic format (e-mails, documents, databases, uploaded batches of data, etc.) are stored either on the servers of the European Labour Authority or of its contractors.

ELA’s contractors are bound by a specific contractual clause for any processing operations of your data on behalf of ELA, and by the confidentiality obligations deriving directly from the General Data Protection Regulation in the EU Member States (‘GDPR’ [Regulation \(EU\) 2016/679](#).)

In order to protect your personal data, ELA has put in place a number of technical and organisational measures in place. 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.

7. Who has access to your personal data and to whom is it disclosed?

Access to your personal data is provided to ELA staff responsible for carrying out this processing operation and to authorised staff according to the “need to know” principle. Such staff abide by statutory, and when required, additional confidentiality agreements.

The external contractor staff will have access to specific parts of the personal data on a need to know basis and after the report is done (1 year from the start of the study) will transfer all data to the ELA Cooperation and Support Unit where staff on a need to know basis will have access to all data categories to work on different studies and from different perspectives.

Any report published by the European Labour Authority will not contain personal data.

Please note that pursuant to Article 3(13) of the Regulation, public authorities (e.g. Court of Auditors, EU Court of Justice) which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients. The processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing.

The information we collect will not be given to any third party, except to the extent and for the purpose we may be required to do so by law.

8. What are your rights and how can you exercise them?

You have specific rights as a ‘data subject’ under Chapter III (Articles 14-25) of Regulation (EU) 2018/1725, in particular the right to access, your personal data and to rectify them in case your personal data are inaccurate or incomplete. Where applicable, you have the right to erase your personal data, to restrict the processing of your personal data, to object to the processing, and the right to data portability.

You have consented to provide your personal data to the Cooperation and Support Unit for the present processing operation. You can withdraw your consent at any time by notifying the Data Controller. The withdrawal will not affect the lawfulness of the processing carried out before you have withdrawn the consent.

You can exercise your rights by contacting the Data Controller, or in case of conflict the Data Protection Officer. If necessary, you can also address the European Data Protection Supervisor. Their contact information is given under Heading 9 below.

Where you wish to exercise your rights in the context of one or several specific processing operations, please provide their description (i.e. their Record reference(s) as specified under Heading 10 below) in your request.

9. Contact information

- The Data Controller

If you would like to exercise your rights under Regulation (EU) 2018/1725, or if you have comments, questions or concerns, or if you would like to submit a complaint regarding the collection and use of your personal data, please feel free to contact the Data Controller:

cooperation-support@ela.europa.eu

- The Data Protection Officer (DPO) of ELA

You may contact the Data Protection Officer (data-protection@ela.europa.eu) with regard to issues related to the processing of your personal data under Regulation (EU) 2018/1725.

- The European Data Protection Supervisor (EDPS)

You have the right to have recourse (i.e. you can lodge a complaint) to the European Data Protection Supervisor (edps@edps.europa.eu) if you consider that your rights under Regulation (EU) 2018/1725 have been infringed as a result of the processing of your personal data by the Data Controller.

10. Where to find more detailed information?

ELA Data Protection Officer (DPO) publishes the register of all processing operations on personal data by ELA, which have been documented and notified to him. You may access the register via the following link: <https://www.ela.europa.eu/en/privacy-policy>.

This specific processing operation has been included in the DPO's public register with the following Record reference: DPR-ELA-2025-0004: ELA research and analysis activities supporting cooperation between Member States.