



European Labour Authority

DATA PROTECTION OFFICER

**RECORD OF PROCESSING OPERATIONS ON PERSONAL DATA**

DPR-ELA-2025-0006 ELA Good Practices Database

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**1 PART 1: PUBLIC - RECORD (ARTICLE 31<sup>1</sup>)****Part 1 is published on Europa****1.1 GENERAL INFORMATION**

<b>Record reference</b>	DPR-ELA-2025-0006
<b>Title of the processing operation</b>	DPR-ELA-2025-0006 ELA Good Practices Database
<b>Controller entity</b>	Cooperation Support Unit
<b>Joint controllers</b>	<input checked="" type="checkbox"/> N/A <input type="checkbox"/> YES, fill in details below
Names and contact details of respective joint controllers	
Description of the main responsibilities of each of the controllers, and the essence of the Joint controllership arrangements.	
Joint controllership arrangement (Article 28(1))	<input type="checkbox"/> Link: <input type="checkbox"/> Attachment
<b>Processor(s)</b>	<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 Microsoft Ireland South County Business Park, One Microsoft Place, Carmanhall and Leopardstown, Dublin, D18 P521, Ireland
<b>Data Protection Officer</b> Name and contact details	Daniela Qatam Benetin 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

<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.

<b>Keywords</b>	<ol style="list-style-type: none"> <li>1. <input checked="" type="checkbox"/> Administrative tasks</li> <li>2. <input type="checkbox"/> Annual assessment</li> <li>3. <input type="checkbox"/> Financial operations <ol style="list-style-type: none"> <li>a. <input type="checkbox"/> Call for tenders</li> </ol> </li> <li>4. <input type="checkbox"/> Human resources <ol style="list-style-type: none"> <li>a. <input type="checkbox"/> Staff appraisal <ol style="list-style-type: none"> <li>i. <input type="checkbox"/> Certification application</li> </ol> </li> <li>b. <input type="checkbox"/> Staff selection <ol style="list-style-type: none"> <li>i. <input type="checkbox"/> National detached experts</li> <li>ii. <input type="checkbox"/> Officials</li> <li>iii. <input type="checkbox"/> Temporary agents</li> </ol> </li> <li>c. <input type="checkbox"/> Time management <ol style="list-style-type: none"> <li>i. <input type="checkbox"/> Flexitime</li> <li>ii. <input type="checkbox"/> Maternity leave</li> </ol> </li> </ol> </li> </ol>
<b>Language of the record</b>	English
<b>Record Model</b>	No
<b>The data subjects that the record concerns</b>	<ol style="list-style-type: none"> <li>1. <input type="checkbox"/> Beneficiaries</li> <li>2. <input checked="" type="checkbox"/> Citizens</li> <li>3. <input type="checkbox"/> Contractors</li> <li>4. <input type="checkbox"/> Journalists</li> <li>5. <input type="checkbox"/> Local agents</li> <li>6. <input type="checkbox"/> National detached experts</li> <li>7. <input type="checkbox"/> Independent experts/academics</li> <li>8. <input type="checkbox"/> Members of ELA</li> <li>9. <input type="checkbox"/> Officials of other EU Institutions, agencies and bodies</li> <li>10. <input type="checkbox"/> Detached officials</li> <li>11. <input checked="" type="checkbox"/> Officials of national authorities</li> <li>12. <input type="checkbox"/> Retired officials and agents</li> <li>13. <input type="checkbox"/> Special advisers</li> <li>14. <input type="checkbox"/> Temporary agents</li> <li>15. <input type="checkbox"/> Auxiliary agents</li> <li>16. <input type="checkbox"/> Contractual agents</li> <li>17. <input type="checkbox"/> Trainees</li> </ol>

## 1.2 PURPOSE AND DESCRIPTION OF THE PROCESSING

### 1.2.1 Purpose

The purpose of the processing operations is the collection, management, and elaboration of good practices submitted. The Cooperation Support Unit collects and uses the contact details of individuals who represent legal entities that have submitted a good practice in response to a Call for Good Practices issued by ELA. These details are used specifically to follow up with applicants for additional information about their application. Collected applications will be reviewed and published online.

The database and corresponding good practices have been set up in line with Article 11 of Regulation (EU) 2019/1149 of the European Parliament and of the Council establishing a European Labour Authority. It aims to promote the exchange and dissemination of experiences and good practices, including examples of cooperation between relevant national authorities.

### 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

Anonymous data can be retained for a longer period for statistical, scientific, or historical purposes.

### 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  
Management of good practices by ELA staff
2. ☒ Manual processing
  - a. ☒ Word documents
  - b. ☒ Excel sheet
  - c. ☒ Any other, specify
3. ☒ Any other mode, specify  
The application form and good-practice fiche template will have predefined sections that will be filled out by applicants

### Description

### 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:**

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

The technical solution is the design of a database where applicants can upload their good practice applications, which are at a later stage revised in cooperation with the ELA. Once finalised, they will be stored in the database and available to the public. The open call for good practices will be published on ELA's website, and the database will be accessible through the link on ELA's website.

The information will be gathered through the database.

The Cooperation Support Unit is the Controller of this process of personal data.

**1.3 DATA SUBJECTS AND DATA CATEGORIES**

**1.3.1 Data subjects' categories**

1. Internal to organisation	N/A
2. External to organisation	<input checked="" type="checkbox"/> Yes Data subjects are individuals who represent legal entities who respond to the calls for good practices

**1.3.2 Data categories/fields**

Indicate the categories of data that will be processed

**Registration in the database:**

The categories of personal data collected when registering online and further processed are:

- Contact person representing the legal person: name, surname, job position, email address of the contact point or the legal person they represent

**Screening of good practice applications**

The Cooperation Support Unit will screen the applications to ensure that they are in line with the criteria defined in the call for good practices.

**Selection and management:**

The categories of data collected and further processed for pre-selected good-practice applications are:

- Revision and finalisation of good practice fiches, which means that applicants will be invited by ELA to provide additional information about their good practice through the database (for examples of activities and objectives). No further personal data will be required from the applicant.

**Contact list:**

The legal subject representatives can be invited as speakers at ELA's events. A specific consent will be requested.

**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,

<input type="checkbox"/> political opinions, <input type="checkbox"/> religious or philosophical beliefs, <input type="checkbox"/> trade union membership, Or/and, <input type="checkbox"/> Genetic data, biometric data for the purpose of uniquely identifying a natural person, <input type="checkbox"/> Data concerning health, <input type="checkbox"/> Data concerning a natural person's sex life or sexual orientation.
<input checked="" type="checkbox"/> N/A

**Additional information**

*In principle the Controller does not collect and process special categories of data (i.e. data revealing racial or ethnic origin, political opinions, religion or philosophical beliefs, trade-union memberships, or data concerning health or sex life) as defined in Article 10.1 of Regulation 2018/1725.*

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

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

**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	Optional	
		Start date/moment	End date/moment
Data concerning good practices and contact persons' details	All good practices will be published in the database and available to the public for 30 years.	Submission of the application and the confirmation of the submission	N/A

**1.5 RECIPIENTS**

Origin of the recipients of the data	
1. <input checked="" type="checkbox"/> Within the EU organization	ELA Capacity Building Sector Different Units or Sectors in ELA on needs to know basis
2. <input checked="" type="checkbox"/> Outside of the EU organization	<i>General public</i>

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 checked="" type="checkbox"/> Any other third party, specify
Specify who has access to which parts of the data: The module "Apply good practices" used to manage the good practice applications will not be available to the public. Only finalised fiches will be available to the public through the module "All Good Practices"	

### Description

Within ELA, the entire database, including the module for applying and managing good practices, will be accessible. The unit responsible is the Cooperation Support Unit, Capacity Building Sector. This ensures that all relevant personnel within ELA can access and manage the data effectively.

Externally, all good practice fiches that have been finalised and validated by the applicants will be made available to the general public.

The external contractors shall be engaged in technical upgrades and maintenance of the database. These contractors will have access to the data as necessary (this will be determined by ELA) to perform their duties, ensuring the database remains functional and up to date.

## 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,	
Country(ies) to which the data is transferred	
<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	
Names of the international organisations to which the data is transferred	
<b>3. Legal base for the data transfer</b> <input type="checkbox"/> Transfer on the basis of the European Commission's <b>adequacy decision</b> (Article 47) <input type="checkbox"/> Transfer subject to <b>appropriate safeguards</b> (Article 48.2 and .3), specify: <ul style="list-style-type: none"> <li>2. (a) <input type="checkbox"/> A legally binding and enforceable instrument between public authorities or bodies. Standard data protection clauses, adopted by               <ul style="list-style-type: none"> <li>(b) <input type="checkbox"/> the Commission, or</li> <li>(c) <input type="checkbox"/> the European Data Protection Supervisor and approved by the Commission, pursuant to the examination procedure referred to in Article 96(2).</li> <li>(d) <input type="checkbox"/> Binding corporate rules, <input type="checkbox"/> Codes of conduct, <input type="checkbox"/> Certification mechanism</li> </ul> </li> </ul>	



pursuant to points (b), (e) and (f) of Article 46(2) of Regulation (EU) 2016/679, where the processor is not a Union institution or body.

3. Subject to the authorisation from the European Data Protection Supervisor:

☐ Contractual clauses between the controller or processor and the controller, processor or the recipient of the personal data in the third country or international organisation.

☐ Administrative arrangements between public authorities or bodies which include enforceable and effective data subject rights.

☐ Transfer based on an **international agreement** (Article 49), specify

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**4. Derogations for specific situations** (Article 50.1 (a) –(g))

☒ N /A

☐ Yes, derogation(s) for specific situations in accordance with article 50.1 (a) –(g) apply (ies).

In the absence of an adequacy decision , or of appropriate safeguards, transfer of personal data to a third country or an international organisation is based on the following condition(s):

(a) ☐ The data subject has explicitly consented to the proposed transfer, after having been informed of the possible risks of such transfers for the data subject due to the absence of an adequacy decision and appropriate safeguards

(b) ☐ The transfer is necessary for the performance of a contract between the data subject and the controller or the implementation of pre-contractual measures taken at the data subject's request

(c) ☐ The transfer is necessary for the conclusion or performance of a contract concluded in the interest of the data subject between the controller and another natural or legal person

(d) ☐ The transfer is necessary for important reasons of public interest

(e) ☐ The transfer is necessary for the establishment, exercise or defense of legal claims

(f) ☐ The transfer is necessary in order to protect the vital interests of the data subject or of other persons, where the data subject is physically or legally incapable of giving consent

(g) ☐ The transfer is made from a register which, according to Union law, is intended to provide information to the public and which is open to consultation either by the public in general or by any person who can demonstrate a legitimate interest, but only to the extent that the conditions laid down in Union law for consultation are fulfilled in the particular case

## 1.7 INFORMATION TO DATA SUBJECTS ON THEIR RIGHTS

Rights of the data subjects
<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: [Privacy policy | European Labour Authority \(europa.eu\)](#) )

☐ 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.

#### Description:

Privacy Statement will be publicly available on the main website of ELA and attached to the specific Call.

### 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 (availability), alteration of data (integrity) or unauthorised access (authentication), 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.