



European Labour Authority

DATA PROTECTION OFFICER

**RECORD OF PROCESSING OPERATIONS ON PERSONAL DATA**

**DPR-ELA-2025-0007 Management of ELA Translation Facility for Information activities and  
ELA Translation application**

**1 PART 1: PUBLIC - RECORD (ARTICLE 31<sup>1</sup>)****1.1 GENERAL INFORMATION**

<b>Record reference</b>	DPR-ELA-2025-0007
<b>Title of the processing operation</b>	Translation application for management and monitoring of translation request under the Translation Facility for Information
<b>Controller entity</b>	The European Labour Authority, Information and EURES 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 type="checkbox"/> N/A <input checked="" type="checkbox"/> YES The European Labour Authority, Information and EURES Unit
<b>External organisation(s)/entity(ies) Names and contact details</b>	<input type="checkbox"/> N/A <input checked="" type="checkbox"/> YES Translation Centre for the Bodies of the European Union (CdT) Bâtiment Technopolis Gasperich 12E, rue Guillaume Kroll L-1882 Luxembourg
<b>Data Protection Officer Name and contact details</b>	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
<b>Language of the record</b>	English

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<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

The European Labour Authority requires translation and other language services services to meet its obligations under Regulation 2019/1149 of the European Parliament and of the Council of 20 June 2019 establishing a European Labour Authority ('ELA Regulation'). According to Article 35 of the ELA Regulation, these translation services shall be provided by the Translation Centre of the Bodies of the European Union (Translation Centre) via their electronic portal - [eCdT Client Portal 2.0](#).

This record aims to cover the personal data:

- requested to have access to the specific tool/system
  - The Translation Centre created the accounts of the requesters with their personal details on the **Translation Centre portal**. ELA inputs and updates the details of the users on this portal, including the user name, name, surname, professional email and (optional) phone number, as well as the country represented in the case of Member States representatives (National Translation Coordinators). The Translation Centre sends automatic notification to the requesters and to the Superusers (ELA staff) of their portal on ELA's side in relation to receipt of a translation request, changes regarding final cost and delivery deadline, as well as at the delivery of translated files etc.  
N.B.: The Translation Centre created individual accounts on eCdT Portal for each Member State to send translation request under ELA Translation Facility for Information; each Member State appointed a National Translation Coordinator to manage their account on eCdT portal.
  - The Translation Centre may contact the requesters, i.e. to clarify the purpose of work requests, to negotiate deadlines, to ask additional information (format, background material, etc.) or to know where the results of the work request shall be delivered.
  - ELA collects data of the single National Translation Coordinators on Share Point (Excel document) and this list will be included in **ELA stakeholders relation management app (SRM app)**.
  - ELA collects emails of clarification in relation to translation requests via SharePoint, Ares records and, once in implementation, via **ELA Translation app for management and monitoring of translation requests**.
- requested for consultation via annual satisfaction surveys (anonymous or not) regarding the quality of the translation and language services (by ELA) as a mechanism to ensure the internal control on the quality of services received from the Translation Centre
- requested to ensure regular exchanges (including emails and meetings) with the National Translation Coordinators for the effective implementation of the Translation Facility for information

### 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 (i.e., EU Survey, email; ELA Translation app for monitoring and request management; National Translation Coordinators have profiles and use

the translation management app of the Translation Centre for Bodies of the European Union [eCdT Client Portal 2.0](#))

iii. ☒ Any other, specify

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

### Description

With the implementation of the new **ELA Translation App** linked to the **ELA stakeholders relation management (SRM) app**, the **personal data of the National Translation Coordinators appointed by EU Member States and EEA countries under ELA Translation Facility for Information will be included in the database of the SRM app.**

The ELA staff involved in the translation activities with access to the Translation app may have their name, surname, position in ELA and office email stored in the Translation app for information that allows them to use this app with the allocated roles.

The National Translation Coordinators (NTCs) as Data Subjects will not have metadata in the ELA Translation app, as the NTCs will not have direct access to the app. ELA may require and store clarifications in relation to the individual requests for translation and other language services via the Translation app's 'Timeline' email functionality. The emails from the NTCs may contain details as work email, name and surname, organization and their role.

For each translation and language service request, personal data are stored in the Translation Centre Portal's database, namely: contact person (name, surname), email, phone number (optional), country (optional).

In this way, requesters can easily be identified and, if necessary, contacted by the Translation Centre.

Besides, there are return addresses to which the outcome of the request must be sent. It can be either a single personal administrative e-mail address or a functional mailbox.

Requesters have associated a specific return address, which is normally a personal administrative e-mail address that was used to create/update the account.

A search function is available. On the screen, each request corresponding to the search criteria, once opened, includes the names of the contact person and the contact email. By opening a request, it is possible to see its details.

#### 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

**1.2.5 Comments on the processing of the data****1.3 DATA SUBJECTS AND DATA CATEGORIES****1.3.1 Data subjects' categories**

1. Internal to organisation	ELA staff with valid identification / authentication credentials.
2. External to organisation	National Translation Coordinators (limited to one person per Member State) nominated by the Member State via the Working Group on Information Members according to the Executive Director's Decision on the operational modalities of the Translation Facility for Information

**1.3.2 Data categories/fields**

The data fields are: name, first name, administrative phone number (not requested, but may be voluntarily offered), administrative address (not requested, but may be voluntarily offered) and e-mail address of the principal return address, the contact person, the person responsible of a request, the institution they are representing and their role in the institution. There are situations in which the National Translation Coordinator provides contact details, such as name, surname, email of a colleague or a functional mailbox for the translated files delivery in case of their unavailability

The same fields are kept for data subjects who play the role of preparator, approver and administrator of a request (ELA staff).

None of the data fields/Categories of data fields falls under Article 10 of the Regulation.

**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**

**If applicable, indicate the reasons under article 10(2) allowing the processing of the special categories of data:**

- (a) ☐ The data subject has given explicit consent to the processing of those personal data for one or more specified purposes, [...].
- (b) ☐ Processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security[...].
- (c) ☐ Processing is necessary to protect the vital interests of the data subject or of another person where the data subject is physically or legally incapable of giving consent.
- (d) ☐ Processing is carried out in the course of its legitimate activities with appropriate safeguards by a non-profit-seeking body which constitutes an entity integrated in a Union institution or body and with a political, philosophical, religious or trade-union aim [...].
- (e) ☐ Processing relates to personal data which are manifestly made public by the data subject.
- (f) ☐ Processing is necessary for the establishment, exercise or defense of legal claims or whenever the Court of Justice of the European Union is acting in its judicial capacity.
- (g) ☐ Processing is necessary for reasons of substantial public interest, [...]
- (h) ☐ Processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services [...].
- (i) ☐ Processing is necessary for reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health or ensuring high standards of quality and safety of health care and of medicinal products or medical devices [...].
- (j) ☐ Processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes [...].

### 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	5 years

### Description

According to the ELA filing plan and specific retention list: ELA.10 Facilities and management > 10.4 Management of translations: The files documenting the implementation of the translation policy, the management of document translations (internal or external), linguistic and quality advice, terminology, translation/management tools will be kept for 5 years.

## 1.5 RECIPIENTS

Origin of the recipients of the data
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1. <input checked="" type="checkbox"/> Within the EU organization	<p>Recipients</p> <p>ELA staff that requested the translation</p> <p>ELA staff with super user role in the Translation Centre app have access to download all translated documents and to all users contact data (ELA staff and external users of ELA services)</p>
2. <input checked="" type="checkbox"/> Outside the EU organization	<p>Recipients</p> <p>The National Translation Coordinators (limited to one person per Member State) nominated according to the ELA Executive Director's <a href="#">Decision no 8 2025 ELA INF Translation Facility.pdf</a> and subsequent decisions on operational modalities of ELA Translation Facility for Information</p> <p>National authorities - the National Translation Coordinator collects and submits translation requests according to priorities at the national level. ELA discloses the contact details of the National Translation Coordinator to national authorities interested in translation support</p>

Categories of the data recipients
<p>1. <input type="checkbox"/> A natural or legal person</p> <p>2. <input checked="" type="checkbox"/> Public authority</p> <p>3. <input type="checkbox"/> Agency</p> <p>4. <input type="checkbox"/> Any other third party, specify</p> <p>Specify who has access to which parts of the data:</p> <p>- ELA staff and the Translation Centre have access to the National Translation Coordinators' data due to the management of the translation requests. ELA may disclose the contact details of the National Translation Coordinator to the national authorities interested in the translation support as the National Translation Coordinator collects and submits the translation requests at the national level.</p>

**Description**

According to article 4 of Executive Director Decision no. 8/2025, 'each Member State shall appoint a National Translation Coordinator who shall coordinate the submission of translation and other language services requests on behalf of his/her national administration.' ELA staff and the Translation Centre have access to the National Translation Coordinators' data due to the management of the translation requests. ELA may disclose the contact details of the National Translation Coordinator to the national authorities interested in the translation support as the National Translation Coordinator collects and submits the translation requests at the national level.

**1.6 INTERNATIONAL DATA TRANSFERS**

Transfer to third countries or international organisations of personal data
<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>

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> ( <i>Article 47</i> ) <input type="checkbox"/> Transfer subject to <b>appropriate safeguards</b> ( <i>Article 48.2 and .3</i> ), specify: 2. (a) <input type="checkbox"/> A legally binding and enforceable instrument between public authorities or bodies. Standard data protection clauses, adopted by (b) <input type="checkbox"/> the Commission, or (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). (d) <input type="checkbox"/> Binding corporate rules, <input type="checkbox"/> Codes of conduct, <input type="checkbox"/> Certification mechanism 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: <input type="checkbox"/> 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. <input type="checkbox"/> Administrative arrangements between public authorities or bodies which include enforceable and effective data subject rights.  <input type="checkbox"/> Transfer based on an <b>international agreement</b> ( <i>Article 49</i> ), specify	
<b>4. Derogations for specific situations</b> ( <i>Article 50.1 (a) –(g)</i> ) <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).  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) <input type="checkbox"/> 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) <input type="checkbox"/> 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) <input type="checkbox"/> 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) <input type="checkbox"/> The transfer is necessary for important reasons of public interest (e) <input type="checkbox"/> The transfer is necessary for the establishment, exercise or defense of legal claims (f) <input type="checkbox"/> 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: <https://eulabourauthority.sharepoint.com/sites/PersonalDataProtection>)
- External website ☒ (URL: <https://www.ela.europa.eu/en/privacy-policy> )

- ☒ 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.

Guide available on: [Your data protection rights at ELA](#)

## 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