

## **PROTECTION OF YOUR PERSONAL DATA**

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

**Processing operation:** *ELA WEBTOOL PILOT – Mobility Information and Rights Assistant (MIRA)*

**Data Controller:** Information and EURES Unit -Information and Services sector

**Record reference:** DPR-ELA-2025-0005

### **Table of Contents**

- 1. Introduction**
- 2. Why and how do we process your personal data?**
- 3. On what legal ground(s) do we process your personal data?**
- 4. Which personal data do we collect and further process?**
- 5. How long do we keep your personal data?**
- 6. How do we protect and safeguard your personal data?**
- 7. Who has access to your personal data and to whom is it disclosed?**
- 8. What are your rights and how can you exercise them?**
- 9. Contact information**
- 10. Where to find more detailed information?**

## **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 ELA collects, handles and ensures 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 *ELA WEBTOOL PILOT – Mobility Information and Rights Assistant (MIRA)* undertaken by the Information and EURES Unit -Information and Services sector is presented below.

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

Purpose of the processing operation: The Information and EURES Unit - Information and Services sector, collects and uses your personal information to serve as a core element of the project's development, playing a crucial role in fine-tuning the chatbot's performance. It will be used to refine the retrieval-augmented generation (RAG) framework, improving the tool's ability to accurately fetch relevant information from external sources. Both positive and negative feedback from testers is essential for training the model, facilitating iterative adjustments to the LLM's response generation process.

As part of the personal data processing framework, a logging mechanism was implemented to ensure traceability and accountability throughout the user's account lifecycle. When a user account is created, key personal data - such as the user's email address and identifying credentials - are collected and securely stored. These data are automatically integrated into the audit logs, which capture login events, access patterns, and administrative interactions involving that account. The logs record personal data such as user identifiers, email addresses, IP addresses, and timestamps, making it possible to monitor system usage and detect anomalous or unauthorised behaviour. These records are essential for safeguarding user data and investigating incidents involving personal data breaches. Access to audit logs is strictly limited to authorised personnel through predefined access management protocols, ensuring that sensitive information, including email addresses and login metadata, remains protected against unauthorised access or tampering. Logged data are stored securely, subject to retention limits and encryption where appropriate, in line with data protection obligations.

The main channel for submitting and temporarily storing personal data directly by the testers during the pilot phase of MIRA, other than the previously mentioned above, is through the integrated feedback mechanism. Test users may engage with this feature via the chatbot's user interface by indicating whether a response was helpful (like/dislike) and by providing written comments. These interactions are temporarily stored on SharePoint for the purpose of improving the tool's performance and will be deleted upon completion of the testing phase.

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**

*ELA processes your personal data, because:*

*(a) processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Union institution or body;*

*(d) the data subject has given consent to the processing of his or her 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 Information and EURES Unit - Information and Services Sector collects the following categories of personal data:

| <b>Data category</b>            | <b>Type of data</b>   |
|---------------------------------|---|
| <b>Identification data</b>      | - Full name of stakeholders   |
| <b>Contact information</b>      | - Email address   |
| <b>Expertise information</b>    | - Expertise of the tester – related to an EU Member State.  |
| <b>Access and permissions</b>   | - Tester's roles and permissions in administration console and database (data and feature access) |
| <b>Logs</b>                     | - Tester's interactions – Exclusively on adding new sources and deletion of sources               |
| <b>Consent records</b>          | - Documentation of tester consent for data processing, and communication preferences              |
| <b>Feedback interaction</b>     | - Tester's comments – on MIRA's response and context of the conversation                          |
| <b>Access and credentials</b>   | -Tester's email and password that allow access to the system                                      |
| <b>Audit logs configuration</b> | - Access-related events but also firewall logs and security system events                         |

The provision of personal data is required for participation in the pilot phase of the tool. The collection of such data, including selected excerpts of user interactions and identifying information, is necessary to fulfil the specific purpose of the pilot, the evaluation and fine-tuning of the tool to ensure the accuracy of its responses and the adequacy of the legal sources retrieved. Failure to provide these data would hinder the ability to incorporate expert feedback, potentially resulting in suboptimal tool performance and reduced relevance of search results during development.

**Access to the AI system's user interface (and ability to interact with it) will be granted exclusively to testers who provide explicit consent by agreeing to the conditions presented on the screen at beginning of each new interaction.** No access will be permitted without this agreement. Prior to proceeding, users must confirm their understanding and acceptance by selecting two mandatory checkboxes:

- Consent for the processing of personal data by the European Labour Authority (ELA) for the purpose of testing the AI system, in accordance with Regulation (EU) 2018/1725.
- Informed consent to participate in the AI system testing, acknowledging that they have been duly informed of all relevant aspects, including the scope, purpose, and data handling procedures.

Testers retain the right to withdraw their consent and request the deletion of their personal data at any time by contacting ELA at [data-protection@ela.europa.eu](mailto:data-protection@ela.europa.eu). Only upon confirming both checkboxes will the "Confirm" button activate, enabling a user to click it and be given the access to the system.

**Any modification to its wording, or to the procedures concerning the processing or storage of testers' personal data, will be duly reflected and updated in this Record to ensure transparency and continued compliance with applicable data protection regulations.**

## **5. How long do we keep your personal data?**

The Information and EURES Unit - Information and Services Sector only keeps your personal data for the time necessary to fulfil the purpose of collection or further processing, namely for testing purposes during the pilot phase of the MIRA project. These data serve as a core element of the project's development, playing a crucial role in fine-tuning the chatbot's performance. They will be used to refine the retrieval-augmented generation (RAG) framework, improving the tool's ability to accurately fetch relevant legal information from external sources. Both positive and negative feedback from users is essential for training the model, facilitating iterative improvements to the LLM's response generation process.

All personal data will be securely stored and permanently deleted by 31 December 2025 – End of the pilot phase of MIRA.

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

All personal data in electronic format (emails, documents, databases, uploaded batches of data, etc.) are stored on the servers of the European Labour Authority. 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](#)).

To ensure the protection of your personal data, ELA has implemented several 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 in line with 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.

In particular:

ELA Resources Unit – ICT sector.

ELA Information and EURES Unit – Information and Services sector.

Accenture:

In the context of the MIRA tool's risk assessment, Accenture acts as a data processor under the provisions outlined in Article 14.2 of the agreement (DIGIT/A3/PR/2018/035 – CLOUD II, DPS2 MC11 SOFIA – FWC DI-7980). The Contractor must comply with strict conditions regarding data access, retention, and international transfers, as well as support the Controller in case of data breaches or necessary audits. The processing activities are defined in the contract and are subject to prior approval by the Controller, ensuring alignment with GDPR and Regulation (EU) 2018/1725 requirements.

|                          | Data element            | Location(s)              | Who has access*                        |
|--------------------------|-------------------------|--------------------------|--|
| Internal to organisation | Full name               | SharePoint               | KM Admin                               |
|                          | Email address           | Admin console/SharePoint | Admin (AC), Power Admin (AC), KM Admin |
|                          | Expertise information   | SharePoint (feedback)    | KM Admin                               |
|                          | Roles and permissions   | Admin console/SharePoint | Power Admin (AC), KM Admin             |
|                          | Interaction logs        | SharePoint               | KM Admin                               |
|                          | Consent records         | System level             | ICT Admin                              |
|                          | Feedback interaction    | SharePoint               | KM Admin                               |
|                          | Access credentials      | System level             | ICT Admin                              |
|                          | Audit log configuration | System-level (ICT logs)  | ICT Admin                              |
|                          |                         |                          |  |
| External to organisation | Full name               | SharePoint               | Content Approver                       |
|                          | Email address           | SharePoint               | Content Approver                       |

**\* Roles and access:**

ICT administrator – System/Azure resources

Power administrator – Admin console (AC)/SharePoint

Knowledge management (KM) administrator – SharePoint (SP)

Administrator – Admin console (AC)

Content approver – SharePoint (SP)

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

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

You have consented to provide your personal data to ELA Information and EURE\’s Unit – Information and Services sector for the current processing operation. You can withdraw your consent at any time by notifying the Data Controller. The withdrawal will not affect the lawfulness of any processing carried out prior to the withdrawal.

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, you may contact the Data Controller:

[information@ela.europa.eu](mailto:information@ela.europa.eu).

- **The Data Protection Officer (DPO) of ELA**

You may contact the Data Protection Officer ([data-protection@ela.europa.eu](mailto:data-protection@ela.europa.eu)) for any 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](mailto: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/her. You may access the register via the following link: [Privacy policy | European Labour Authority](#).

This specific processing operation has been included in the DPO's public register with the following Record reference: DPR-ELA-2025-0005 ELA Webtool pilot – Mobility Information and Rights Assistant (MIRA).