



European Labour Authority

DATA PROTECTION OFFICER

RECORD OF PROCESSING OPERATIONS ON PERSONAL DATA

DPR-ELA-2026-0003 Budgetary Commitment Management App (ComELA)

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

Record reference	DPR-ELA-2026-0003
Title of the processing operation	Budgetary Commitment Management App (ComELA)
Controller entity	European Labour Authority, Resources Unit, Finance & Procurement Sector (ELA Finance 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 Microsoft Ireland South County Business Park, One Microsoft Place, Carmanhall and Leopardstown, Dublin, D18 P521, Ireland. Insight Technology Solutions Belgium Inc., Romeinsesteenweg 468, 1853 Grimbergen, Belgium. Avanade, Guildensporenpark 76, Block H, 9820, Merelbeke, Belgium Such processors are bound by contracts defining the terms of service, including personal data protection clauses indicating their responsibilities as provided by Regulation (EU) 2018/1725.
Data Protection Officer Name and contact details	Daniela QATAM BENETIN European Labour Authority Landererova 12, 811 09 Bratislava I Slovakia Email: data-protection@ela.europa.eu
Corporate Record	<input type="checkbox"/> Yes <input checked="" 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 Description

The Budgetary Commitment Management application is an internal business application developed on Microsoft Dynamics and used within the European Labour Authority (ELA). The tool supports the Finance, Budget and Procurement Sector in the electronic handling of budgetary commitment requests originating from ELA units.

The application enables authorised ELA staff to submit, register, verify, approve, and monitor budgetary commitment requests throughout their lifecycle, in accordance with ELA's financial and budgetary rules. Access to the tool is restricted to authorised users based on their role in the budgetary workflow.

Authorised ELA staff initiate budgetary commitment requests by entering the required budgetary and procurement information in the application. Requests are routed through predefined workflow steps, allowing designated users to review, verify, and approve the requests in accordance with their assigned roles and applicable financial rules.

Throughout the lifecycle of a request, the application records the status of the budgetary commitment and maintains an audit trail of actions performed by authorised users, ensuring traceability and accountability. Access to data and functionalities is governed by role-based access controls, so that users can view and process only the information necessary for the performance of their duties.

The application supports the consultation of related procurement and contractual documentation and enables monitoring of budgetary commitments by the Finance, Budget and Procurement sector for financial management and internal control purposes.

Role-Based Access Control (RBAC) is a security mechanism that ensures users are granted access only to the data and functionalities necessary for their specific roles, adhering to the principle of least privilege. To maintain its effectiveness, roles and permissions are periodically reviewed. This approach not only ensures the segregation of duties but also minimizes the risks of unauthorized access.

Role-specific access is applied as follows:

Granular access:

- o ELA authorised Staff from Finance, Budget and Procurement Sector: Full access (view, submit, register, verify, and monitor), user admin rights.
- o All ELA staff members, in accordance with their assigned role and access rights within the application: View, create, submit, verify and approve.

Dynamic assignment: users are assigned roles upon onboarding or on written request from HoU/HoS and can only access resources necessary for their tasks.

Audit and monitoring: all access is logged and periodically reviewed to ensure compliance and detect anomalies.

1.2.2 Purpose

In accordance with Article 47 of ELA Financial Rules, the purpose of processing personal data through the Budgetary Commitment management application is to ensure the effective, lawful, and transparent internal management and control of budgetary commitment requests within the European Labour Authority.

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

1.2.3 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
- Anonymization
- Encryption
- Collecting minimum set of personal data

1.2.4 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
2. Manual processing
 - a. Word documents
 - b. Excel sheet
 - c. Any other, specify
PDF documents, Email communication, Other Microsoft Applications.
3. Any other mode, specify

1.2.5 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

Microsoft Dataverse is a cloud-based relational database platform that powers data storage and management across the Microsoft Power Platform and Dynamics 365. The application integrates with ARES and SharePoint at presentation level only, through hyperlinks. No document content or personal data are transmitted or stored within the application environment. Security, access control, and retention of linked content are managed by the respective systems.

1.2.6 Comments on the processing of the data

The technical solution consists of an integrated online platform designed to support ELA's management and control of budgetary commitment requests. Only minimal personal data is processed, strictly for registration, monitoring, and user management purposes. The application operates within a clearly defined cloud-based environment equipped with dedicated safeguards, ensuring that processing remains proportionate and compliant with data protection requirements.

To ensure security and proper segregation of duties, the application has its own infrastructure, access controls, and data-protection measures:

RBAC Repository

Storage and processing location:

Hosted in ELA's secure internal environment, physically and logically segregated from public-facing systems.

Infrastructure:

Implemented as a controlled and access-restricted module within Dynamics, but with restricted access layers.

Safeguards:

Strict role-based access control (RBAC), Encryption at rest and in transit, Periodic access reviews and full audit logging, Mandatory multi-factor authentication (MFA), Continuous logging, monitoring, and auditing of administrative activities, Access limited to ELA staff within ELA-controlled environments (no external devices or systems permitted).

Overall data processing approach

The application follows a minimal-data, high-security processing model, ensuring that only essential personal data is collected and processed. Strong security controls, including encryption, RBAC, MFA, and structured logging are consistently applied across the application.

The application allows electronic circulation of documents linked to ARES and/or SharePoint between actors involved in the budgetary commitment process.

The application is linked via URL links to ARES and SharePoint sites.

The application integrates with ARES exclusively via secure hyperlinks, allowing authorised users to access contractual and procurement documents stored in ARES. The application does not retrieve, store, replicate, or otherwise process personal data contained in ARES records. Access to ARES content is subject to ARES access controls and authentication mechanisms.

1.3 DATA SUBJECTS AND DATA CATEGORIES

1.3.1 Data subjects' categories

1. Internal to organisation	<input type="checkbox"/> N/A	
	<input checked="" type="checkbox"/> Yes	<u>Data subjects</u> Authorised ELA staff, including end-users and application administrators, acting as requestors, verifiers, approvers, or system managers.
2. External to organisation	<input checked="" type="checkbox"/> N/A	

1.3.2 Data categories/fields

Indicate the categories of data that will be processed

Description:

Authorised ELA staff, including end-users and application administrators, acting as requestors, verifiers, approvers, or system managers, limited to first name, surname, business phone number, professional role, user identification, access rights, and audit-related metadata.

The application processes audit, traceability, and technical metadata associated with user actions (such as user identifiers, timestamps, status changes, and system logs) that are inherent to the operation of the information system.

The application provides hyperlinks to documents and records stored in ARES. Personal data contained in those records are processed and retained in ARES in accordance with its own Record of Processing Activities and are not stored or otherwise processed by the Budgetary Commitment Management App.

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	Start date/moment
All type of documents	5 years from the date on which the European Parliament grants discharge for the financial year to which the documents relate. (Article 47 of ELA Financial Rules) The discharge of the financial exercise generally takes place 2 years after the financial year (personal data is thus retained as a rule for a total of 7 years);	date on which the European Parliament grants discharge for the financial year to which the documents relate.

Description

Personal data processed in the Budgetary Commitment application are retained in accordance with the ELA filing plan and applicable Union financial and accounting rules. Files relating to budgetary commitment and associated financial management procedures are retained for a maximum period of five (5) years.

1.5 RECIPIENTS

Origin of the recipients of the data	
1. <input checked="" type="checkbox"/> Within the EU organization	<p><u>Recipients</u></p> <ul style="list-style-type: none"> - ELA authorized staff of the Finance, Budget and Procurement Sector - All ELA staff members, in accordance with their assigned role and access rights within the application
2. <input checked="" type="checkbox"/> Outside the EU organization	<p><u>Recipients</u></p> <ul style="list-style-type: none"> - Other institutions delegates (Court of Auditors) for control of the financial file

Categories of the data recipients
<p>1. <input checked="" 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><u>Specify who has access to which parts of the data:</u> Access to personal data is restricted to authorised staff of the European Labour Authority, in particular within the Finance, Budget and Procurement sector, in accordance with role-based access controls. ELA staff on a need-to-know basis will be granted access to the tool.</p>

Description

The main purpose of the Budgetary Commitment Management App is to coordinate and facilitate the process of the budgetary commitment requests internally.

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).

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>)

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:

Guidance on data subjects’ rights available on ELA 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 the personal data solely to authorised persons with a legitimate need to know for the purposes of this processing operation.