**European Labour Authority**

DATA PROTECTION OFFICER

**RECORD OF PROCESSING OPERATIONS ON PERSONAL DATA**

# DPR-ELA-2025-0005 ELA WEBTOOL PILOT – Mobility Information and Rights Assistant (MIRA)

## 1 PART 1: PUBLIC - RECORD (ARTICLE 31[1]) GENERAL INFORMATION

| | |
|---|---|
| **Record reference** | DPR-ELA-2025-0005 |
| **Title of the processing operation** | ELA Webtool pilot – Mobility Information and Rights Assistant (MIRA) |
| **Controller entity** | Information and EURES Unit -Information and Services Sector |
| **Joint controllers** | ☒ N/A ☐ YES, fill in details below |
| **Processor(s)** | ☐ N/A ☒ YES, fill in details below |
| External organisation(s)/entity(ies)<br>Names and contact details | ☐ N/A ☒ YES<br>***Microsoft Ireland Operations Limited***<br>One Microsoft Place South County Business Park<br>Leopardstown<br>Dublin 18 D18 P521<br>Ireland<br><br>**CAN-ARHS Consortium,** composed by:<br>Accenture NV/SA, Rue Picard 11 B100, 1000 Brussels, Belgium and<br><br>ARHS Developments S.A, Boulevard du Jazz, L-4370 Belvaux, Luxembourg |
| **Data Protection Officer**<br>Name and contact details | *Daniela Qatam Benetin*<br>Landererova 12,<br>811 09 Bratislava I<br>Slovakia<br>Email: data-protection@ela.europa.eu |
| **Corporate Record** | ☐ Yes ☒ 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.*

## 1.1 PURPOSE AND DESCRIPTION OF THE PROCESSING

### 1.1.1 Purpose

The goal in this phase is the creation of an AI tool (MIRA), that integrates **GenAI** and **RAG** technologies to answer user-testers' questions with none or minimal risks on providing wrong information, basing its answers solely on official publications (notably websites) at EU level and Member State level, both publicly available.

A Retrieval-Augmented Generation (RAG) solution for Knowledgebase Inquiry Management integrates information retrieval with natural language generation to efficiently address user queries by leveraging a blend of unstructured and structured knowledge sources, to provide accurate, context-aware responses by leveraging both internal documents and advanced AI language models.

Generative AI (GenAI) integrated with Retrieval Augmented Generation (RAG) knowledge management offers a transformative solution by combining the contextual understanding of AI with precise document-based knowledge retrieval.

To enrich its knowledge base and expand its database, MIRA will employ a web scraping tool designed to extract content from relevant official websites, storing publicly available information. This process will follow a structured three-step procedure:

1. An authorised administrator will input a specific URL.

2. The designated webpage will be converted into a PDF document.

3. MIRA will then process and incorporate the textual content from the PDF through a vectorisation mechanism to its knowledge base.

For enhancing quality, the MIRA pilot phase will include a **feedback mechanism**, that will temporary store the following information for further processing (SQL DB):

1. Question
2. Answer
3. List of references / resources (with hyperlinks)
4. Parts of the information the answers are based on
5. Name of question creator
6. Time and date
7. Country of the tester's expertise
8. Like / dislike
9. Comment
10. LLM for user interaction
11. System prompt from selected LLM configuration (AI Assistant)

MIRA's system consists of two primary components: the **admin console** and the interactive **SharePoint knowledge management** site, each with distinct roles and access controls to ensure secure and efficient operation.

**Admin console**: The admin console is a secure interface available exclusively to ELA staff and, temporarily, to its contractor. It allows administrators to configure and manage the chatbot's settings, including adjusting the LLM's prompt and temperature settings to influence response generation. Admins also can grant roles to other users, such as testers, and control their access to various parts of the system. This includes managing access to the chatbot itself and overseeing the feedback mechanism, where feedback from testers is gathered to refine the system. The admin console's role-based access control ensures that only authorised internal staff can perform these administrative tasks, maintaining a secure environment for system management.

**SharePoint knowledge management**: The SharePoint site acts as the knowledge management platform for the MIRA pilot phase, with access and editing capabilities depending on the user's role. Role base access will be given by knowledge management administrators on SharePoint, which will consist exclusively of authorised ELA staff. Testers, based on their permissions, can add new sources for the chatbot's scraper mechanism to download, enhancing the system's knowledge base. Testers can also access and delete content

they have been granted permission to, but all their actions, such as content modifications or deletions, require approval by a content approver. This approval process ensures that only validated and relevant data are integrated into the knowledge base. The SharePoint platform fosters collaboration by allowing testers to contribute to the chatbot's knowledge while maintaining control over content integrity and accuracy.

**Terms of use**

Testers will be authenticated via SSO (User authentication via Single Sign-On), allowing testers to access multiple applications or systems with a single set of login credentials (such as a username and password).

In addition, a Conditional Access Policy is implemented to further enhance security. Access and certain functionalities are restricted based on user roles.

| | | |
|---|---|---|
| **Express consent** | - Testers must provide consent before their personal data are used in specific applications. | All testers, whether internal or external staff, are required to provide consent prior to being granted access to the tool and its functionalities. |
| **Data minimisation** | - Personal data collection is limited to what is strictly necessary for operational and testing purposes.<br>- Retention policies ensure data are not stored longer than required. | -The tool collects only the personal data necessary for its operation, e.g.,<br>• Comments from feedback.<br>• Name of external experts.<br>• Member State the externals have expertise in.<br>• Audit logs |

### 1.1.2 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

### 1.1.3 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

2. ☐ Manual processing
    a. ☐ Word documents
    b. ☐ Excel sheet
    c. ☒ Any other, specify
        Manual input of data

3. ☐ Any other mode, specify

**Description**

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.

Access to the platform's functionalities shall not be granted immediately upon user registration. Prior to obtaining access, each user must be formally approved by ELA's internal ICT team for integration into the network environment. As a prerequisite, the user account must be registered as an external user within ELA's designated tenant.

Following approval and account registration, users shall be required to authenticate their identity using Multi-Factor Authentication (MFA) as a mandatory condition for accessing the tool. This measure ensures compliance with ELA's security standards and mitigates the risk of unauthorised access.

Notwithstanding the granting of network access, access to specific functionalities shall remain subject to Role-Based Access Control (RBAC) protocols. These protocols enforce a secondary layer of security by defining and restricting user permissions based on pre-assigned roles, thereby determining which functionalities each user may access.

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.

1.1.4 **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

Email Integration
Aggregating of non-personal data

**Description:**

Audit logs are securely stored in centralised or cloud-based systems, encrypted at rest and in transit, access-restricted, and maintained under retention and deletion policies. These logs contain personal

data (e.g., user email addresses and login timestamps), making their secure and compliant storage a legal requirement under the EUDPR (European Data Protection Regulation).

**Databases created in MySQL**

- **System database** - MySQL managed. Feedback is stored centrally in the System database (MySQL managed) to enable unified access via Power BI.
- **Core database** - managed by team, database for whole core structure (except chatbot application), there is only one instance of core database, since Admin tool and Copy functionality is shared across all chatbot applications.
- **AI Chatbot database** (per each instance) - managed by team, this is chatbot specific database, meaning that each new instance of chatbot application will contain its own database. Naming convention is based on the metadata (from UI part of Copy functionality in Admin – each chatbot database will have its unique suffix/prefix).

### 1.1.5 Comments on the processing of the data

The processing of the data serves 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.

**Virtual Network (VNet) Protection**

All data are stored within a secure, private network called a Virtual Network (VNet). This network acts like a secure area where only authorised users can access the data.

**Role-Based Access Control (RBAC)**

Access to data is controlled through specific roles assigned to users. These roles determine what actions users can perform, ensuring that only those with the appropriate permissions can access or manage the data.

**VPN Access for Data Management**

To manage the data, users must connect to the secure network through a Virtual Private Network (VPN). This connection ensures that the data remain protected while being accessed or managed.

**Personal data from testers to be processed:**

Identification data – First name and surname of stakeholders.
Contact information, access and credentials - Email address.
Expertise information - Expertise of the tester – related to an EU Member State.
Access and permissions - Tester's roles and permissions in admin console and database (data and feature access).
Logs - Tester's interactions – Exclusively on adding new sources and deletion of sources.
Consent forms - Documentation of tester consent for data processing, and communication preferences.
Feedback interaction - Tester's comments on AI system's response and context of the conversation.
Audit logs configuration - Access-related events but also logs generated by firewalls and security systems events

In the context of strengthening system oversight and security accountability, ELA undertook a structured configuration of audit logs to ensure comprehensive traceability of activities across both application and network layers. This involved enabling detailed logging mechanisms not only for user access and administrative actions, but also for firewall events and security system outputs, thereby creating a robust dataset for behaviour tracking, anomaly detection, and incident investigation. Access to these audit logs was tightly controlled through dedicated access management protocols, limiting visibility and modification rights to authorised personnel only, thus preserving the integrity and confidentiality of sensitive information, including security events and firewall-related activity. Furthermore, ELA ensured the systematic logging of administrative actions — such as configuration changes, system-level updates, and security rule modifications — to establish a verifiable trail of accountability. These logs serve as a foundational element for post-incident review and reinforce governance over both user management and infrastructure-level operations.

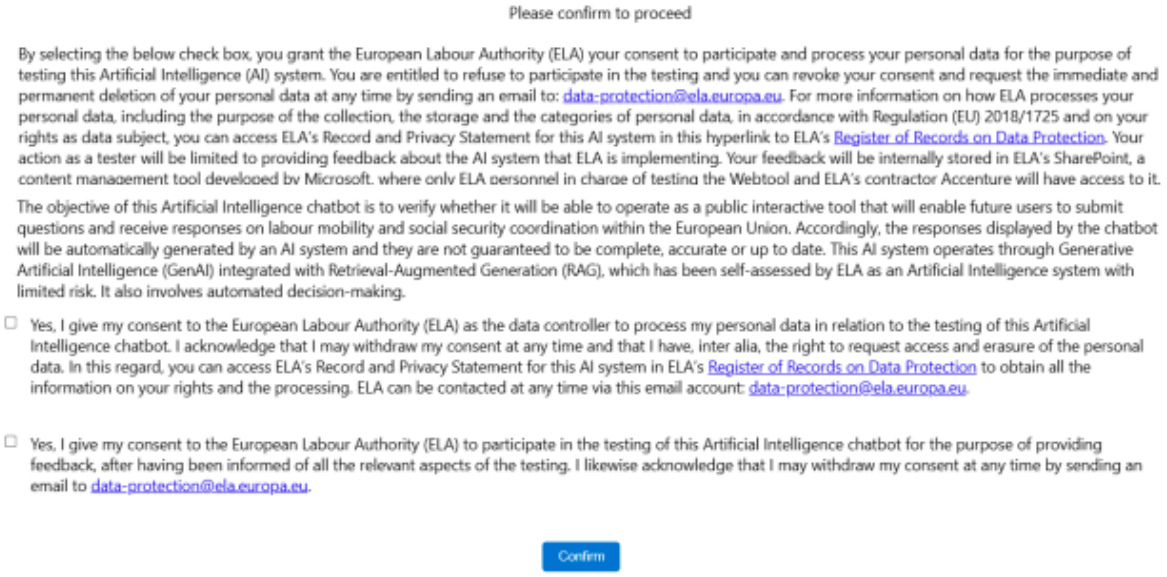
**Access to the AI system's user interface (and ability to interact with it) will be granted exclusively to testers who provide explicit consent by agreeing to the conditions presented at beginning of each new interaction.** No access will be permitted without this agreement. Prior to proceeding, users 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. 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.**



Please confirm to proceed

By selecting the below check box, you grant the European Labour Authority (ELA) your consent to participate and process your personal data for the purpose of testing this Artificial Intelligence (AI) system. You are entitled to refuse to participate in the testing and you can revoke your consent and request the immediate and permanent deletion of your personal data at any time by sending an email to: data-protection@ela.europa.eu. For more information on how ELA processes your personal data, including the purpose of the collection, the storage and the categories of personal data, in accordance with Regulation (EU) 2018/1725 and on your rights as data subject, you can access ELA's Record and Privacy Statement for this AI system in this hyperlink to ELA's Register of Records on Data Protection. Your action as a tester will be limited to providing feedback about the AI system that ELA is implementing. Your feedback will be internally stored in ELA's SharePoint, a content management tool developed by Microsoft, where only ELA personnel in charge of testing the Webtool and ELA's contractor Accenture will have access to it.

The objective of this Artificial Intelligence chatbot is to verify whether it will be able to operate as a public interactive tool that will enable future users to submit questions and receive responses on labour mobility and social security coordination within the European Union. Accordingly, the responses displayed by the chatbot will be automatically generated by an AI system and they are not guaranteed to be complete, accurate or up to date. This AI system operates through Generative Artificial Intelligence (GenAI) integrated with Retrieval-Augmented Generation (RAG), which has been self-assessed by ELA as an Artificial Intelligence system with limited risk. It also involves automated decision-making.

☐ Yes, I give my consent to the European Labour Authority (ELA) as the data controller to process my personal data in relation to the testing of this Artificial Intelligence chatbot. I acknowledge that I may withdraw my consent at any time and that I have, inter alia, the right to request access and erasure of the personal data. In this regard, you can access ELA's Record and Privacy Statement for this AI system in ELA's Register of Records on Data Protection to obtain all the information on your rights and the processing. ELA can be contacted at any time via this email account: data-protection@ela.europa.eu.

☐ Yes, I give my consent to the European Labour Authority (ELA) to participate in the testing of this Artificial Intelligence chatbot for the purpose of providing feedback, after having been informed of all the relevant aspects of the testing. I likewise acknowledge that I may withdraw my consent at any time by sending an email to data-protection@ela.europa.eu.

Confirm

**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.

## 1.2 DATA SUBJECTS AND DATA CATEGORIES

### 1.2.1 Data subjects' categories

| | |
|---|---|
| 1. Internal to organisation | ☐ N/A |

| | | |
|---|---|---|
| | ☒ Yes | **Data element** / **Location(s)** / **Who has access**<br>Full name / SharePoint / KM Admin<br>Email address / Admin console/ SharePoint / Admin (AC), Power Admin (AC), KM Admin<br>Expertise information / SharePoint (feedback) / KM Admin<br>Roles and permissions / Admin console/SharePoint / Power Admin (AC), KM Admin<br>Interaction logs / SharePoint / KM Admin<br>Consent records / System level / ICT Admin<br>Feedback interaction / SharePoint / KM Admin<br>Access credentials / System level / ICT Admin<br>Audit log configuration / System-level (ICT logs) / ICT Admin |
| 2. External to organisation | ☐ N/A | |
| | ☒ Yes | Full name / SharePoint / Content approver<br>Email address / SharePoint / Content approver |

**Roles and accesses:**

ICT administrator – System/Azure resources
Power administrator – Admin console (AC)/SharePoint (SP)
Knowledge management (KM) administrator – SharePoint (SP)
Administrator – Admin console (AC)
Content approver – SharePoint (SP)

### 1.2.2 Data categories/fields

Indicate the categories of data that will be processed

**Description:**

| **Data category** | **Type of data** |
|---|---|
| **Identification data** | - Full name of stakeholders |
| **Contact Information, access and credentials** | - Email address |
| **Expertise information** | - Expertise of the tester – related to an EU Member State |
| **Access and permissions** | - Tester's roles and permissions in admin console and database (data and feature access) |
| **Logs** | - Tester's interactions – Exclusively on adding new sources and deletion of sources |
| **Consent records** | Documentation of tester consent for data processing, and communication preferences |
| **Feedback interaction** | - Tester's comments – on MIRA's response and context of the conversation |
| **Audit logs configuration** | Access-related events but also logs generated by firewalls and security systems events |

#### 1.2.2.1 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 defence 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 […].

#### 1.2.2.2 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 ☒**<br>**Yes ☐** |

### 1.3 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 |
|---|---|
| Identification data | Until: *31/12/2025 – End of the pilot phase of MIRA* |
| Contact information | Until: *31/12/2025 – End of the pilot phase of MIRA* |
| Expertise information | Until: *31/12/2025 – End of the pilot phase of MIRA* |
| Access and permissions | Until: *31/12/2025 – End of the pilot phase of MIRA* |
| System logs and metadata | Until: *31/12/2025 – End of the pilot phase of MIRA* |
| Feedback interactions | Until: *31/12/2025 – End of the pilot phase of MIRA* |

**Description**

All personal data will be stored exclusively 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. It 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 adjustments to the LLM's response generation process.

The feedback will directly inform the fine-tuning of the LLM by adjusting its ability to understand and process complex labour mobility queries, ensuring the retrieval mechanism effectively matches queries with the most accurate legal sources. This will optimise the system's capacity to provide precise, contextually relevant, and user-satisfactory responses. The continuous integration of feedback will help improve the model's robustness, ensuring that the chatbot can handle increasingly sophisticated queries and deliver more reliable answers.

All personal data collected, as mentioned in section 1.3.2, will be safely stored and deleted by 31/12/2025, at the end of the pilot phase.

### 1.4 RECIPIENTS

**Origin of the recipients of the data**

1. ☒ Within the EU organisation

| | | | | |
|---|---|---|---|---|
| 1. Internal to organisation | ☐ N/A | | | |
| | ☒ Yes | **Data Element** | **Location(s)** | **Who Has Access** |
| | | Full Name | SharePoint | KM Admin (SP) |
| | | Email Address | Admin Console/ SharePoint | Admin (AC), Power Admin (AC), KM Admin (SP) |
| | | Expertise Information | SharePoint (feedback) | KM Admin (SP) |
| | | Roles & Permissions | Admin Console/SharePoint | Power Admin (AC), KM Admin (SP) |
| | | Interaction Logs | SharePoint | KM Admin (SP) |
| | | Consent Records | System level | ICT Admin |
| | | Feedback Interaction | SharePoint | KM Admin (SP) |
| | | Access Credentials | System level | ICT Admin |
| | | Audit Log Configuration | System-level (ICT logs) | ICT Admin |
| 2. External to organisation | ☐ N/A | | | |
| | ☒ Yes | Full Name | SharePoint | Content Approver (SP) |
| | | Email Address | SharePoint | Content Approver |

ELA staff on a need-to-know basis

2. ☒ Outside the EU organisation

External contractors' staff on a need-to-know basis

The contractor will have access to all personal data elements until the end of their contract, except for access credentials, audit logs, and consent records, which will remain under the exclusive control of the organisation's internal ICT administrators.

**Categories of the data recipients**

1. ☒ A natural or legal person
2. ☒ Public authority
3. ☒ Agency
4. ☒ Any other third party, specify
   Microsoft (Cloud service provider)
   Accenture

**Specify who has access to which parts of the data:**

| **Data category** | **Type of data** |
|---|---|
| **Identification data** | - Full name of stakeholders |
| **Contact information, access and credentials** | - Email address |
| **Expertise information** | - Expertise of the tester – related to an EU Member State |
| **Access and permissions** | - Tester's roles and permissions in admin console and database (data and feature access) |

| | |
|---|---|
| **Logs** | - Tester's interactions – Exclusively on adding new sources and deletion of sources |
| **Consent records (1)*** | Documentation of tester consent for data processing, and communication preferences |
| **Feedback interaction** | - Tester's comments –on MIRA's response and context of the conversation |
| **Audit logs configuration (1)*** | Access-related events but also logs generated by firewalls and security systems events |

ELA Resources Unit – ICT sector.
ELA Information and EURES Unit – Information and Services sector.

External contractor (Accenture) - Access until the contract expires.

(1)* Exclusive to internal ELA's ICT sector.

### 1.5 INTERNATIONAL DATA TRANSFERS

| **Transfer to third countries or international organisations of personal data** | |
|---|---|
| **1. Transfer outside of the EU or EEA**<br>☒ N/A, transfers do not occur and are not planned to occur<br>☐ YES, | |
| Country(ies) to which the data is transferred | |
| **2. Transfer to international organisation(s)**<br>☒ N/A, transfers do not occur and are not planned to occur<br>☐ Yes, specify further details about the transfer below | |
| Names of the international organisations to which the data are transferred | |
| **3. Legal base for the data transfer**<br>☐ Transfer on the basis of the European Commission's **adequacy decision** *(Article 47)*<br>☐ Transfer subject to **appropriate safeguards** *(Article 48.2 and .3),* specify:<br>2. (a) ☐ A legally binding and enforceable instrument between public authorities or bodies.<br>Standard data protection clauses, adopted by<br>(b) ☐ the Commission, or<br>(c) ☐ the European Data Protection Supervisor and approved by the Commission, pursuant to the examination procedure referred to in Article 96(2).<br>(d) ☐ Binding corporate rules, ☐ Codes of conduct, ☐ 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:

☐ 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 i**nternational agreement** *(Article 49),* specify

**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 defence 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

## 1.6 INFORMATION TO DATA SUBJECTS ON THEIR RIGHTS

| **Rights of the data subjects** |
| --- |
| *Article 17 – Right of access by the data subject* |

*Article 18 – Right to rectification*

*Article 19 – Right to erasure (right to be forgotten)*

*Article 20 – Right to restriction of processing*

*Article 21 – Notification obligation regarding rectification or erasure of personal data or restriction of processing*

*Article 22 – Right to data portability*

*Article 23 – Right to object*

*Article 24 – Rights related to Automated individual decision-making, including profiling*

#### 1.6.1 Privacy statement

☒ The data subjects are informed about their rights and how to exercise them in the form of a privacy statement attached to this record.

**Publication of the privacy statement**

☒ Published on website

Web location:

- ELA internal website ☒
- External website ☒(URL:Privacy policy | European Labour Authority )

☐ 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.

### 1.7 SECURITY MEASURES

Short summary of overall technical and organisational measures implemented to ensure information security:

All data in electronic format (emails, documents, uploaded batches of data etc.) are stored on secure servers operated by the European Labour Authority (ELA) or 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 accordance with Regulation (EU) 2018/1725, ELA has implemented a range of technical and organisational measure to ensure the security of personal data. 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. This measures are subject to periodic review to ensure continued effectiveness and compliance with applicable data protection standards.