

## **PROTECTION OF YOUR PERSONAL DATA**

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

**Processing operation:** DPR-ELA-2026-0003 Budgetary Commitment Management App (ComELA)

**Data Controller:** European Labour Authority, Resources Unit, Finance, Budget & Procurement Sector

**Record reference:** DPR-ELA-2026-0003

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## 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 we collect, handle and ensure 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 "**Budgetary Commitment Management App (ComELA)**" undertaken by Resources Unit, Finance, Budget & Procurement Sector is presented below.

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

Purpose of the processing operation: Finance, Budget & Procurement Sector collects and uses your personal information to ensure the effective, lawful, and transparent internal management and control of budgetary commitment requests within the European Labour Authority (ELA) in accordance with Article 47 of ELA Financial Rules.

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.

Your 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?

We process your personal data, because, according to Article 5(1) of Regulation (EU) 2018/1725:

*(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;*

*(b) processing is necessary for compliance with a legal obligation to which the controller is subject;*

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 Finance, Budget & Procurement Sector collects the following categories of personal data:

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

The application also processes audit, traceability, and technical metadata generated by user actions (such as user identifiers, timestamps, status changes, and system logs), which are necessary for the secure and proper functioning of the information system.

The application may provide hyperlinks to documents and records stored in ARES. Any personal data contained in those records are processed and retained within ARES in accordance with its own Record of Processing Activities and are neither stored nor otherwise processed by the Budgetary Commitment Management Application.

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

Finance, Budget & Procurement Sector only keeps your personal data for the time necessary to fulfil the purpose of collection or further processing, namely for:

Data category	Retention period	Optional
		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);	<i>date on which the European Parliament grants discharge for the financial year to which the documents relate.</i>

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.

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

All personal data in electronic format (e-mails, documents, databases, uploaded batches of data, etc.) are stored either on the servers of the European Labour Authority or of its contractors.

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.)

In order to protect your personal data, ELA has put in place a number of technical and organisational measures in place. 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.

## **7. Who has access to your personal data and to whom is it disclosed?**

Personal data processed through the Budgetary Commitment Management App (ComELA) are accessible only to authorised persons for the performance of their official duties and are disclosed strictly where necessary and in compliance with the applicable data protection framework:

### **Within the EU organization:**

-ELA authorised staff of the Finance, Budget and Procurement Sector

-All ELA staff members, in accordance with their assigned role and access rights within the application

**Outside the EU organization:** Other institutions delegates (Court of Auditors) for control of the financial file

*Please note that pursuant to Article 3(13) of the Regulation, public authorities (e.g. Court of Auditors, EU Court of Justice) which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients. The processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing.*

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

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

You have specific rights as a 'data subject' under Chapter III (Articles 14-25) of Regulation (EU) 2018/1725, in particular the right to access, your personal data and to rectify them in case your personal data are inaccurate or incomplete. Where applicable, you have the right to erase your personal data, to restrict the processing of your personal data, to object to the processing, and the right to data portability.

You have consented to provide your personal data to the Finance, Budget & Procurement Sector for the present processing operation. You can withdraw your consent at any time by notifying

the Data Controller. The withdrawal will not affect the lawfulness of the processing carried out before you have withdrawn the consent.

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, please feel free to contact the Data Controller:

[Ela-finance@ela.europa.eu](mailto:Ela-finance@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)) with regard to 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. You may access the register via the following link: <https://www.ela.europa.eu/en/privacy-policy>.

This specific processing operation has been included in the DPO's public register with the following Record reference: DPR-ELA-2026-0003 Budgetary Commitment Management App (ComELA).