

PROTECTION OF YOUR PERSONAL DATA

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

Processing operation: ELA Survey on the ELA website

Data Controller: European Labour Authority, Governance and Coordination Unit,
Communication Sector

Record reference: DPR-ELA-2022-0022

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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 in the context of "ELA UX and accessibility upgrade". 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.

These sessions are conducted to gather feedback on the usability of the ELA website. Sessions are held online via Microsoft Teams and **are recorded**. Participation is voluntary and based on your explicit prior consent.

Why and how do we process your personal data?

Purpose of the processing operation: NETCOMPANY - INTRASOFT SA on behalf of ELA conducts moderated usability testing sessions to gather qualitative feedback on users' experience of the ELA website. The data collected are used to inform improvements to the website's design, content and navigation.

Sessions are conducted live via Microsoft Teams and are recorded for internal analysis purposes only. Recordings are used solely to allow the research team to review participants' interactions and verbal feedback after the session. They are not published or shared beyond the project team.

We obtained your personal data directly from you, as you have participated in previous events/surveys related to EURES activities and you are part of our contact list covered by Record '[DPR-ELA-2022-0024 ELA Contact lists & network partners databases](#)'.

Your personal data will not be used for any automated decision-making including profiling. For platforms and tools used to organise and manage the web survey, the following records will apply:

- Microsoft Teams: EC M365 environment, European Commission Record DPR-EC 04966
- EUSurvey: European Commission Record DPR-EC-01488

On what legal ground(s) do we process your personal data

We process your personal data, because, according to Article 5(1)(d) of Regulation (EU)2018/1725, you have given consent to the processing of your personal data for one or more specific purposes.

We do not process **special categories of personal data**, therefore, Article 10 of the abovementioned Regulation does not apply.

2. Which personal data do we collect and further process?

In order to carry out this processing operation NETCOMPANY - INTRASOFT SA on behalf of ELA collects the following categories of personal data:

- name (as provided at registration or visible in the Teams session)
- audio video recordings of the session will be performed to ensure the verbatim record of what was said during the session.
- screen activity and interactions observed during the session
- verbal and written feedback provided during the session, including personal opinions
- job category and country of residence (if provided at registration)
- consent form

Only personal data necessary for participation in the usability testing sessions will be collected and processed.

Furthermore, respondents may spontaneously provide other, non-requested personal data in the context of their reply to a targeted consultation. In all other cases, it is the responsibility of the respondents who opted for confidentiality of their personal data to avoid any reference in the submissions that would reveal their identity.

Audio- or video recordings are only published based on the explicit consent of the data subject. Should the subject matter of a targeted consultation require respondents to provide personal data in their response, these will only be published subject to explicit consent of the data subject.

The provision of personal data beyond what is technically necessary to participate in a Teams session is not mandatory. Participants may choose to keep their camera off; however, audio recording is necessary for the purposes of the session analysis.

Participants who do not consent to recording (both audio and video) will not be audio- or video-recorded. Where a participant does not consent to recording, the recording will be paused or disabled, and the participant's contribution will be captured only through written notes.

3. How long do we keep your personal data?

Upon completion of the task, NETCOMPANY - INTRASOFT SA will delete the data from their database. The data will be retained solely within the EU Survey platform. Access will be granted only to ELA, and NETCOMPANY - INTRASOFT SA will be required to delete their access accordingly. ELA only keeps your personal data for the time necessary to fulfil the purpose of collection or further processing, namely for 12 (twelve) months period after the end of the survey.

In case of publication of the audio- or video recordings or replies to the specific survey, after obtaining explicit consent of the data subject, data could be kept for 5 years.

4. 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.

5. 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.

ELA’s contractor will process your data on ELA’s behalf. ELA’s contractor for this operation is: NETCOMPANY - INTRASOFT SA

Brussels
Tour Bastion Place du Champ de Mars 5/10
BE - 1050 Brussels
Belgium
P: +32 22 38 17 11
E: information@netcompany.com or privacy@netcompany.com

When explicitly agreed by you, some of your personal data (the views expressed by the respondents to a targeted consultation, identity of the stakeholder or respondent, audio- or video recordings) will be published on a publicly available website on an European website, either as received, in the form of a summary report, included in a wider policy document, or printed to illustrate communication material, photo albums, etc.

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.

6. 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 NETCOMPANY - INTRASOFT SA for the present processing operation on behalf of ELA. 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.

7. 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, communication@ela.europa.eu.

The Data Protection Officer (DPO) of ELA

You may contact the Data Protection Officer (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) 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.

8. 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-2022-0022 : ELA Public consultations/Survey/Questionnaires/Quiz