



European Labour Authority

DATA PROTECTION OFFICER

RECORD OF PROCESSING OPERATIONS ON PERSONAL DATA

DPR-ELA-2026-0005 Call for Expression of Interest - Establishment of a pool of higher education institutions for the co-development and delivery of an Advanced Certified Diploma Course in EU Labour Mobility

1 PART 1: PUBLIC - RECORD (ARTICLE 31¹)

1.1 GENERAL INFORMATION

Record reference	DPR-ELA-2026-0005
Title of the processing operation	Call for Expression of Interest - Establishment of a pool of higher education institutions for the co-development and delivery of an Advanced Certified Diploma Course in EU Labour Mobility
Controller entity	<i>Cooperation Support Unit, Capacity Building Sector</i>
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 For events, logistics and accommodation: In case of an organization by an external company , 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. 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 the EU Member States ('GDPR' Regulation (EU) 2016/679). Additional details will be described in the specific Privacy Statement. Microsoft Ireland South County Business Park, One Microsoft Place, Carmanhall and Leopardstown, Dublin, D18 P521, Ireland
Data Protection Officer Name and contact details	Daniela QATAM BENETIN ELA Data Protection Officer 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 Purpose

The European Labour Authority (ELA), established by Regulation (EU) 2019/1149, aims to ensure fair, simple and effective enforcement of Union rules on labour mobility and social security coordination. Under Article 4(e) of the Regulation, the Authority supports Member States through capacity building activities regarding the effective application and enforcement of relevant Union law, in accordance with Article 11.

In line with its mandate, the Capacity Building Sector within the Cooperation Support Unit develops training and capacity-building activities to strengthen cooperation between EU Member States and enhance interaction between ELA and national administrations. These include specialised training programmes on EU labour mobility for public officials.

Within this framework, ELA launches a **Call for Expressions of Interest** to establish a pool of higher education institutions (HEI) across the EU/EEA that may collaborate with the Authority in the design and delivery of a Certified Diploma Course in EU Labour Mobility, providing advanced professional training for public officials involved in the application and enforcement of Union rules on cross-border labour mobility.

Personal data included in the submitted applications will be processed for the purpose of assessing the eligibility of the applicant institutions and the professional qualifications of the proposed course coordinator and experts.

Applications are submitted through the EUSurvey platform. Personal data related to contact persons/representatives of the applicant HEIs submitting the application, as well as the proposed course coordinators and experts, will be processed in the context of the submission and evaluation of applications.

To this end, the Controller carries out the following activities:

- (i) The collection of personal data of contact persons representing applicant higher education institutions.
- (ii) The processing of personal data of proposed course coordinators and experts included in the submitted applications.
- (iii) The assessment of the professional qualifications and expertise of the proposed course coordinators and experts.
- (iv) The management of contact and communication with the above persons in the context of the evaluation of applications and potential cooperation with selected institutions.
- (v) The management of reimbursement of the fees, etc., if applicable.

1.2.2 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

-Access to personal data is restricted to authorised ELA staff involved in the management and evaluation of the Call for Expressions of Interest and reimbursement purposes, on a need-to-know basis and according to role-based access controls.

-Collection limited to data strictly necessary

Statistics may be generated on the number of total proposed course coordinators, experts and participants only in aggregated and anonymous form.

1.2.3 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
3. Any other mode, specify

Personal data are collected through the submission of applications to the Call for Expressions of Interest via the EU Survey platform. The application form contains predefined sections to ensure that all applicants provide comparable and relevant information.

Applicants are also required to attach the CV of the proposed course coordinators and experts together with the application form. The submitted applications and CV are reviewed and evaluated by authorised ELA staff in order to assess the eligibility and organisational capacity of the applicant institutions and the qualifications of the proposed course coordinator and experts.

1.2.4 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

Description:

Personal data are stored electronically in ELA IT systems and document management environments (e.g. EU Survey platform and internal document storage systems).

1.2.5 Comments on the processing of the data

The processing is limited to the collection, storage, review and evaluation of applications submitted by HEIs within the framework of the Call for Expressions of Interest.

The information will be gathered through EUSurvey. The Cooperation Support Unit is the Controller of this process of personal data.

For submission of the applications in the EUSurvey platform, access to the tool requires authentication through EU Login. Any personal data processed for authentication purposes is handled by the European Commission under its own processing operations. For further information on the processing of personal data by EULogin and the EUSurvey tool, please refer to the dedicated processing operations: i) [Commission’s EU Survey record](#), ii) [EU Login data protection notice](#)

1.3 DATA SUBJECTS AND DATA CATEGORIES

1.3.1 Data subjects' categories

1. Internal to organisation	<input checked="" type="checkbox"/> N/A
2. External to organisation	<input checked="" type="checkbox"/> Yes <u>Data subjects</u> - Contact persons/representatives of the applicant higher education institutions submitting the application - Proposed course coordinators - Proposed experts -Students-participants in the certified course, for reimbursement purposes

1.3.2 Data categories/fields

Indicate the categories of data that will be processed

Description:

- **Contact persons/representatives of the applicant higher education institutions submitting the application:** Contact details related to the institution: institution, institutional email address, phone and mobile number

- **Proposed course coordinators and proposed experts:** The categories of personal data collected included in the CVs submitted as part of the application:

- Identity and contact details: first name, last name, title, nationality, full postal address, email address, phone/ mobile number
- Education,
- Expertise,
- Employment history/work experience,
- List of publications,
- Motivation,
- Languages

Screening and evaluation of applications

The Cooperation Support Unit will review the submitted applications in order to verify that the minimum eligibility criteria specified in the Call for Expressions of Interest are fulfilled.

-Reimbursement of students-participants

Once the task(s) have been performed, the additional personal data will be processed to proceed with the reimbursement of the administrative registration fee paid by participants to the hosting HEI for enrolment in the certified course:

The categories of personal data collected and further processed for students-participants are:

- Additional identification data.
- where applicable, financial data strictly necessary for reimbursement purposes, such as bank account details (IBAN and, where applicable, BIC/SWIFT), together with supporting documents evidencing payment of the registration fee.
- administrative forms and supporting information, where required.

The personal data processed in this context will be handled by ELA’s Financial Unit. The reimbursement procedure will be carried out in accordance with the applicable ELA record, namely [‘DPR-ELA-2022-0003 Procurement’](#), where relevant.

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'

<p>The data being processed contain sensitive data which fall(s) under Article 11 'criminal convictions and offences'</p>	<p>N/A <input checked="" type="checkbox"/> Yes <input type="checkbox"/></p>
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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	End date/moment
Data related to submitted applications	Personal data of candidates contained in applications from HEIs will be retained for 5 years after the end of the screening and evaluation procedure	(e.g. April 2026)	(e.g. April 2031)
Data related to the reimbursement	7 years as per the Financial Regulation. Date of payment + 7 years	(e.g. June 2026)	(e.g. June 2033)

Description

The personal data processed in this context will be handled by ELA’s Financial Unit. The reimbursement procedure will be carried out in accordance with the applicable ELA record, namely ‘[DPR-ELA-2022-0003 Procurement](#)’, where relevant.

Once maximum time of retention has been reached, data will be securely deleted or anonymised.

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"> - Authorised ELA staff members of the Capacity Building Sector involved in the management and evaluation of the Call for Expressions of Interest. - ELA Finance, Budget and Procurement Sector (Finance team) on a need-to-know basis
Categories of the data recipients	
1. <input checked="" type="checkbox"/> A natural or legal person 2. <input checked="" type="checkbox"/> Public authority 3. <input type="checkbox"/> Agency 4. <input type="checkbox"/> Any other third party, specify	<p>Specify who has access to which parts of the data:</p> <ul style="list-style-type: none"> - Access to the personal data is restricted to authorised ELA staff of Capacity Building Sector involved in the management and evaluation of the Call for Expression of Interest. These staff members may access the application forms and supporting documents, including the CV of the contact persons/representatives and proposed course coordinator and experts, strictly on a need-to-know basis.

- Authorised members of ELA’s Financial Team may have access to relevant identification and financial data of participants, strictly to the extent necessary for handling the reimbursement of the administrative fee charged by the hosting HEI for enrolment in the certified course.

1.6 INTERNATIONAL DATA TRANSFERS

Transfer to third countries or international organisations of personal data
<p>1. Transfer outside of the EU or EEA</p> <p><input checked="" type="checkbox"/> N/A, transfers do not occur and are not planned to occur</p> <p><input type="checkbox"/> YES,</p>
<p>2. Transfer to international organisation(s)</p> <p><input checked="" type="checkbox"/> N/A, transfers do not occur and are not planned to occur</p> <p><input type="checkbox"/> Yes, specify further details about the transfer below</p>
<p>3. Derogations for specific situations (Article 50.1 (a) –(g))</p> <p><input checked="" type="checkbox"/> N /A</p> <p><input type="checkbox"/> Yes, derogation(s) for specific situations in accordance with article 50.1 (a) –(g) apply (ies).</p>

1.7 INFORMATION TO DATA SUBJECTS ON THEIR RIGHTS

Rights of the data subjects
<p><i>Article 17 – Right of access by the data subject</i></p> <p><i>Article 18 – Right to rectification</i></p> <p><i>Article 19 – Right to erasure (right to be forgotten)</i></p> <p><i>Article 20 – Right to restriction of processing</i></p> <p><i>Article 21 – Notification obligation regarding rectification or erasure of personal data or restriction of processing</i></p> <p><i>Article 22 – Right to data portability</i></p> <p><i>Article 23 – Right to object</i></p> <p><i>Article 24 – Rights related to Automated individual decision-making, including profiling</i></p>

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:

Privacy Statement will be attached to the first communication with the HEIs / [Your data protection rights at ELA](#)

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.