

## **PROTECTION OF YOUR PERSONAL DATA**

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

**Processing operation:** Staff Claims App

**Data Controller:** European Labour Authority, Resources Unit, Finance, Budget and Procurement Sector (Finance Team)

**Record reference:** DPR-ELA-2026-0006

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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 **Staff Claims App** undertaken by the Resources Unit, Finance, Budget and Procurement Sector (Finance Team), is presented below.

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

Purpose of the processing operation: The Finance, Budget and Procurement Sector (Finance Team) collects and uses your personal information to manage and process ELA staff claims in an efficient, transparent, and compliant manner. In particular, your personal data are used to:

- manage staff claims based on applicable ELA decisions;
- enable staff to submit and track claims within the application;
- verify claims and supporting documents and assess the eligibility of costs;
- apply financial ceilings, pro-rata rules, and administrative checks;
- process and execute reimbursements in accordance with applicable financial rules;
- manage declarations and support healthcare enrolment procedures in coordination with HR;
- ensure accurate processing, auditability, traceability, and internal control.

The Staff Claims app is an internal business application developed on Microsoft Dynamics and used within the European Labour Authority (ELA) to support the administration of staff claims.

The tool enables authorised ELA staff to update/upload relevant personal and employment information, submit claims, upload supporting documents, and where required, complete mandatory declarations.

The application centralises the handling of these requests and provides a structured workflow through which Finance Sector can verify eligibility, review supporting documents, validate the completeness of submissions, and approve or reject claims in accordance with the applicable financial, administrative, and audit rules.

Access to the Staff Claims App is strictly role-based and enforced through ELA Entra ID Security Groups, ensuring that users can only access data necessary for the performance of their duties.

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.*

The processing is further grounded in Regulation (EU) 2019/1149 establishing the European Labour Authority, in particular Articles 22(1) and 22(4)(a), (j) and (k), which confer on the Authority the competence to manage its internal organisation, staff related matters and administrative processes. The processing is also carried out in accordance with Decision No 21/2020 of the Management Board of the European Labour Authority on ELA's Financial Rules, in particular Article 73 thereof.

The processing of personal data is further supported, where applicable, by decisions adopted by the Executive Director establishing staff-related measures or schemes implemented through the application. This includes, in particular, Decision No 32/2025 of 22 December 2025 of the Executive Director of the European Labour Authority establishing measures for the year 2026 to support the attractiveness of the European Labour Authority, insofar as the application is used to implement, manage, and monitor such measures.

### **4. Which personal data do we collect and further process?**

In order to carry out this processing operation, the Finance, Budget and Procurement Sector (Finance Team) collects the following categories of personal data:

**Identification and contact data:** Full name, ELA email address, Staff category (TA/CA/Trainee/SNE)

**Employment related data:** Contract start date, Contract end date, place of employment, place of residence (for eligibility in some measures)

**Household / Family data:** Yes/No spouse or registered partner, number of dependent children, residence status of spouse/partner (declared in the app)

**Claim related data:** Subject of claim, expense date, claim amount, prorata ceiling (based on employment dates), eligible amount, status (submitted, under review, ready for payment, rejected, rejected for correction, under payment, paid), confirmation from HR, notes or comments from Finance (if applicable)

**Financial Supporting Documentation:** Invoice, tickets, receipts, bank statements submitted as proof of payment, declarations on Honour

Financial reference identifiers associated with claims (e.g. LEF and BAF codes), displayed for reference purposes only and not used to create, modify, or execute payments

**Healthcare enrollment data (administrative only):** Enrollment status (enrolled, unenrolled), enrollment/unenrollment date

**Access and activity data:** Membership in Entra ID Security Groups for Staff Claims App, login timestamps, user action logs (submissions, declarations), role assignment (staff, HR, Finance)

**Data relating to authorised users of the application:** Identification and professional contact data of authorised ELA staff members accessing or managing the application (e.g. name, professional email address, user identifier), as well as role and access related information and system generated logs recording user actions for security, audit, and accountability purposes

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

The Finance, Budget and Procurement Sector (Finance Team) keeps your personal data for the time necessary to fulfil the purpose of collection or further processing, namely for:

**All data categories:** Files relating to financial transactions are to be retained in the archives for a period of 5 years following the discharge of the financial exercise.

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);

→ Until the end of a possible audit if it started before the end of the above mentioned period.

**IT system and user access data:** data are retained for a period of **one (1) year** from the last recorded user activity, unless further retention is required for security investigations or audit purposes.

## **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. All processing operations are carried out pursuant to the Commission Decision (EU, Euratom) 2017/46 of 10 January 2017 on the security of communication and information systems in the European Commission.

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 Staff Claims App are accessible only to authorised persons for the performance of their official duties and are disclosed strictly where necessary and according to the “need to know” principle. Such staff abide by statutory, and when required, additional confidentiality agreements:

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

- ELA Staff within the HR Sector on a "need-to-know basis"
- Authorised staff of ELA Finance, Budget and Procurement Sector on a "need-to-know basis"
- Authorised staff of ICT Team providing technical or administrative support

### **Outside the EU organisation:**

Personal data may also be made available to EU oversight bodies upon request (e.g., IDOC, IAS, Court of Auditors, OLAF) in line with their mandates.

*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 further 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 personal data collected and processed within the Staff Claims Application will not be transferred to any third country or international organisation.

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 Finance, Budget and Procurement Sector (Finance Team) 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-2026-0006 Staff Claims App