



European Labour Authority

DATA PROTECTION OFFICER

RECORD OF PROCESSING OPERATIONS ON PERSONAL DATA

DPR-ELA-2026-0004 Registration on the Swapcard app for event access and community participation

1 PART 1: PUBLIC - RECORD (ARTICLE 31¹)**1.1 GENERAL INFORMATION**

Record reference	DPR-ELA-2026-0004
Title of the processing operation	Registration on the Swapcard app for event access and community participation
Controller entity	European Labour Authority, Operations Department, Cooperation Support Unit, Capacity Building Sector
Joint controllers	☒ N/A ☐ YES, fill in details below
Processor(s)	☐ N/A ☒ YES, fill in details below
External organisation(s)/entity(ies) Names and contact details	☐ N/A ☒ YES Swapcard Chez Spaces Bonne Nouvelle, 17 - 21 Rue Saint Fiacre, 75002 Paris, France 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) 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).
Data Protection Officer Name and contact details	Daniela QATAM BENETIN European Labour Authority Landererova 12, 811 09 Bratislava I Slovakia 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.

1.2 PURPOSE AND DESCRIPTION OF THE PROCESSING

1.2.1 Purpose

The European Labour Authority (ELA) uses the Swapcard platform in the context of organising and managing online, in-person and hybrid events, meetings and community-related activities. The platform enables ELA to create and host events and to provide registered participants (such as attendees, speakers and moderators) with access to event-related information, including the programme, event materials and sessions.

The platform is used to manage event registration and participation, provide agendas and networking tools, and support the creation and long-term functioning of Communities of Practice by enabling participants to communicate, share documents and collaborate before, during and after events. Participants may also schedule meetings and interact with other participants through the platform.

The processing of personal data is necessary to enable registration of participants to events organised by the Cooperation Support Unit, Capacity Building Sector, to grant access to the related event and Community of Practice hosted on the platform, to manage event-related communication and interactions, and to support collaboration and professional networking among participants.

Under no circumstances will ELA have access to information containing personal data exchanged in private messages between participants within the different communities of practice or spaces of the application. ELA's role is limited to providing access to the platform and facilitating event-related activities for participants.

The platform is provided by a third-party service provider acting as a data processor on behalf of ELA.

Terms and conditions: [Terms and Conditions for Users there Rights | Swapcard](#)

Privacy Policy: [Privacy Policy | Swapcard - Your Data, Your Rights](#)

1.2.2 Processing for further purposes

- ☒ Archiving in the public interest
- ☐ Scientific or historical research purposes
- ☒ Statistical purposes

Safeguards in place to ensure data minimisation

- ☐ Pseudonymisation
- ☒ Any other, specify

Data minimization and deletion process, access controls and role-based permissions are applied to ensure that only authorised personnel can access personal data necessary for event registration and management. Data transmitted through the platform are protected through encryption.

Aggregated statistics may be generated for reporting and evaluation purposes, such as the number of participants in the event. Such statistics will be produced in aggregated or anonymised 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

Description

Participant Registration Flow



Participants access the platform following their registration to the event. Access is granted through an invitation email and authentication using their email address and a personal password.

Participants receive a registration link for the event and access the online registration form hosted on the platform.

During the registration process and depending on the type of the event, participants provide identification and contact information (email address, first name, last name and organisation) as well as practical information where necessary (country of travel, optional mobile phone number, or special needs or requirements).

After the registration is submitted, the application sends an email to the participant with the words 'Your registration to the event <name of event> is confirmed. Let's get started.' After, the participant clicks on Let's get started a page opens inviting the user to create a password. That password can then be used by the participant in the future. Alternatively, they can request to receive a one time code to login. If the latter option is adopted, the user will need to make use of a temporary code every time.

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 is stored in the cloud infrastructure of the event platform provider (Swapcard) in secure databases. Authorised users of the Cooperation Support Unit can access the participant's data through the interface of the platform for the purpose of managing event registrations and participation.

1.2.5 Comments on the processing of the data

Participants receive a registration link to the event and complete the registration form hosted on the platform. Following registration, participants receive access credentials to the event space on the platform, where they can access event-related information and participate in event activities. Participants may also access and manage their personal data through their user profile on the platform.

This record describes the processing of personal data related to the registration and access to events through the Swapcard platform.

For personal data processing activities related to the ELA events per se, please refer to the record: [DPR-ELA-2022-0023 – ELA live, hybrid and digital events, seminars, workshops, conferences, meetings, open/celebration/information days and visits](#).

ELA does not make use of any AI-driven functionalities available within Swapcard. Therefore, no processing of personal data through artificial intelligence takes place in this context.

Also, personal data of participants are not published on publicly accessible websites.

1.3 DATA SUBJECTS AND DATA CATEGORIES**1.3.1 Data subjects' categories**

1. Internal to organisation	☐ N/A	
	☒ Yes	<u>Data subjects</u> -ELA staff participating in events and/or communities of practice -Authorised ELA staff involved in the organisation and management of events/communities of practice (organisers)
2. External to organisation	☐ N/A	
	☒ Yes	<u>Data subjects</u> -All external participants registered to the event/community of practice

1.3.2 Data categories/fields

Indicate the categories of data that will be processed

Description:

For event registration and participation purposes, the following categories of personal data may be processed for participants and ELA staff accessing the platform:

- First name and last name
- Email address
- Organisation/institution
- Country
- Optional contact details (e.g. phone number)
- Practical information required for the organisation of the event, such as travel information, dietary requirements, or accessibility needs.

Personal data exchanged between participants through private messaging or within communities of practice is not actively monitored by ELA. Participants may voluntarily share information, including personal data, within private messages or community discussions.

Communication within the event or community of practice is processed through the platform infrastructure of the service provider. Messages and data transmitted through the platform are protected through encryption and appropriate security measures implemented by the provider.

For the following data categories: **sensitive personal data relating to travel information, dietary requirements, and accessibility needs, information about accommodation that requires reimbursement of related expenses, photographs and audiovisual material, participants' presence list, personal data contained in presentations and documents, contact lists for future communication, and badge/access data**, the processing activity is related to the record "**DPR-ELA-2022-0023 ELA live, hybrid and digital events, seminars, workshops, conferences, meetings, open/celebration/information days and visits**".

In case of further processing by the platform provider, additional categories of personal data (such as profile, interaction, communication and technical usage data) may be processed. Further information is available in the [Swapcard Privacy Policy](#).

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 concerning health,

Description:

Sensitive personal data relating to dietary requirements, accessibility can be collected in order to organise the meetings/visit with a specific mention in the Privacy Statement.

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, [health – food restrictions and special travel needs].

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
Registration data collected for registration and participation in an event	6 months after the last action linked to the event is performed	Collection of the data	
User account and interaction data within Swapcard platform*	3 years after the user's last activity in their account		

Description

*Determined by the platform provider: Participant accounts and related personal data (such as account information and private messages in chats and communities of practice) remain in the system until the participant requests deletion or deletes them manually. In the event that a user's account remains inactive for a period of 3 years, Swapcard will delete the user's account and all of their data. Further information on the processing of personal data of participants and organisers (e.g. networking and interaction data, technical and usage data etc.) by the platform provider can be found in the [Swapcard Privacy Policy](#).

1.5 RECIPIENTS

Origin of the recipients of the data	
1. ☒ Within the EU organization	<u>Recipients</u> - Authorised ELA staff, in particular staff of the Cooperation Support Unit responsible for the organisation and management of events.
2. ☒ Outside the EU organization	<u>Recipients</u> - All external participants registered to the event/community of practice

Categories of the data recipients
1. ☒ A natural or legal person 2. ☒ Public authority 3. ☒ Agency 4. ☒ Any other third party, specify Specify who has access to which parts of the data: Within the EU organisation: -Authorised ELA staff acting as event organisers or administrators have access to the participant registration data necessary for organising and managing the event/community of practice, including First name and last name, email address, organisation/institution, country, phone number (optional), practical information required for the organisation of the event Outside the EU organisation:

-External contractors for organising events: In cases where an event is organised jointly by the European Labour Authority and an external contractor (e.g. for accommodation, dietary restrictions), the contractor may have access to certain personal data necessary for the organisation of the event and will act as a processor on behalf of the European Labour Authority. This may include identification data (first name and last name, contact details and specific information (e.g. dietary requirements, travel information), depending on the nature of the service provided.

External contractors are bound by specific contractual clauses governing the processing of personal data on behalf of the European Labour Authority and by confidentiality obligations in accordance with Regulation (EU) 2016/679.

-The platform provider processes personal data through the platform infrastructure in its role as data processor. Further information on the processing of personal data by the platform provider can be found in the Privacy Policy page of the platform provider.

1.6 INTERNATIONAL DATA TRANSFERS

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

1.7 INFORMATION TO DATA SUBJECTS ON THEIR RIGHTS

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

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: [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.

Description:

Guidance on data subjects' rights available on ELA website.

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.

Swapcard confirmed compliance with recognised security standards and implements appropriate technical and organisational measures to protect personal data. Further information on the security measures implemented by the service provider can be found at: <https://www.swapcard.com/legal/terms-organizer/appendix-c#exhibit-3-to-dpa-security-measures>