



European Labour Authority

DATA PROTECTION OFFICER

RECORD OF PROCESSING OPERATIONS ON PERSONAL DATA

DPR-ELA-2026-0007- Volunteer tester pool for communication products, digital interfaces,
UX/UI tests and information materials

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

Record reference	DPR-ELA-2026-0007
Title of the processing operation	Volunteer tester pool for communication products, digital interfaces UX/UI tests, and information materials
Controller entity	Information Sector
Joint controllers	☒ N/A ☐ YES, fill in details below
Processor(s)	☐ N/A ☒ YES, fill in details below
Internal organisation(s)/entity(ies) Names and contact details	☒ N/A ☐ YES
External organisation(s)/entity(ies) Names and contact details	☐ N/A ☒ YES External contractors and service providers engaged by ELA to support communication, digital services, user research, user experience design, testing, consultation, feedback collection, and related activities.
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	☐ 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 purpose of the processing is to establish and manage a pool of individuals who voluntarily agree to be contacted by ELA for participation in testing, consultation, and feedback activities related to ELA's communication, information and digital services. The pool enables Information Sector to identify and invite suitable participants for activities aimed at assessing, developing, improving or evaluating communication products, information materials, digital services, websites, user interfaces, campaigns, surveys, studies, focus groups and other user-centered activities.

Personal data is processed to manage participation, match volunteers to relevant activities, communicate with selected participants and collect feedback that supports the design, effectiveness and continuous improvement of ELA's services, products and communication activities.

Inclusion in the pool does not automatically enroll an individual in a specific activity. Participation in each activity is voluntary, and selected individuals will receive relevant information about the activity and the processing of their personal data before deciding whether to participate.

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
aggregated and anonymised reporting wherever possible

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 EU Survey form
 - iii. ☐ Any other, specify

Click here to enter text.

2. ☒ Manual processing
 - a. ☒ Word documents
 - b. ☒ Excel sheet
 - c. ☐ Any other, specify
internal tester database maintained in a secure ELA environment

3. ☐ Any other mode, specify

Click here to enter text.

Description

Personal data is manually reviewed, organised and maintained by authorised ELA staff of Information Sector in a secure ELA environment. Data is used to maintain the volunteer tester pool, contact volunteers, coordinate participation in specific activities, and manage communication with participants.

Volunteers submit basic contact and profile data via an EU Survey form or through other voluntary mechanisms established by ELA for the purpose of joining the tester pool.

Participation in each activity is voluntary and subject to a separate project-specific privacy statement.

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

Click here to enter text.

Description:

Personal data is stored electronically within ELA-approved information systems. Access is restricted to authorised ELA staff of the Information Sector.

Comments on the processing of the data

Processing is limited to what is necessary to maintain the volunteer tester pool, communicate with participants, organise participation in consultation, testing and feedback activities. Individuals participate on a voluntary basis and may withdraw from the tester pool at any time. No special categories of personal data are intentionally collected.

The Information Sector will publish an open call on ELA website and ELA's social media.

1.3 DATA SUBJECTS AND DATA CATEGORIES

1.3.1 Data subjects' categories

1. Internal to organisation	☐ N/A	
	☒ Yes	Data subjects ELA staff who voluntarily join the tester pool.
2. External to organisation	☐ N/A	
	☒ Yes	Data subjects Data subjects are natural persons who respond to calls for expression of interest and register as testers through a specific EU Survey or other means

1.3.2 Data categories/fields

Indicate the categories of data that will be processed

Description:

Registration on the pool of testers

The categories of personal data collected when registering online and further processed are for each data subject:

- Identity and contact details: name, surname, email address,
- Participant category (ticking the boxes, e.g. worker, employer, social partner, representative of a national authority, academic/researcher, NGO representative, other)

- Professional sector
- Languages

Participation management data

The categories of personal data processed for the administration and management of the tester pool are, for each data subject:

- Date of registration in the tester pool
- Consent records
- Withdrawal or opt-out requests

Participation in testing, consultation, research and feedback activities

Only personal data necessary for participation in a specific testing, consultation, research or feedback activity will be collected and processed. The categories of personal data may vary depending on the nature and objectives of the activity. The relevant privacy statement will describe the categories of personal data processed and the purposes of the processing. Categories of personal data most frequently processed may include:

- Responses to surveys and questionnaires
- Feedback, comments, opinions and suggestions
- Responses provided during interviews, focus groups, usability testing and other user research activities
- Audio, image or audiovisual data, where recording forms part of the activity and participants have been informed accordingly

Furthermore, participants may spontaneously provide other, non-requested personal data in the context of their reply to an activity.

Participation in specific activities is completely voluntary.

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

Description:

[Click here to enter text.](#)

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, [...].
- (b) ☐ Processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security[...].
- (c) ☐ Processing is necessary to protect the vital interests of the data subject or of another person where the data subject is physically or legally incapable of giving consent.
- (d) ☐ Processing is carried out in the course of its legitimate activities with appropriate safeguards by a non-profit-seeking body which constitutes an entity integrated in a Union institution or body and with a political, philosophical, religious or trade-union aim [...].
- (e) ☐ Processing relates to personal data which are manifestly made public by the data subject.
- (f) ☐ Processing is necessary for the establishment, exercise or defense of legal claims or whenever the Court of Justice of the European Union is acting in its judicial capacity.
- (g) ☐ Processing is necessary for reasons of substantial public interest, [...]
- (h) ☐ Processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services [...].
- (i) ☐ Processing is necessary for reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health or ensuring high standards of quality and safety of health care and of medicinal products or medical devices [...].
- (j) ☐ Processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes [...].

Additional information

Click here to enter text.

1.3.2.2 Data related to 'criminal convictions and offences'

The data being processed contain sensitive data which fall(s) under Article 11 'criminal convictions and offences'	N/A ☒ Yes ☐
Description: <i>Click here to enter text.</i>	

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
Tester pool data (contact details, profile information, consent records)	Data is kept for 3 years from the last recorded interaction with the participant (e.g., registration, participation in an activity or confirmation of interest). If no interaction occurs within this period, the data is deleted or anonymised. Where a participant renews their consent or otherwise confirms their continued interest in remaining in the tester pool, the retention period may be renewed from the date of such confirmation.
Data linked to specific testing activities (recordings, detailed feedback)	Retained in accordance with the retention period specified in the project-specific privacy statement and the applicable ELA retention policy.

Description

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. ☒ Within the EU organization	Recipients Authorised staff of the Information Sector involved in communication, UX/UI and testing activities, on a need-to-know basis.
2. ☒ Outside the EU organization	Recipients External contractors supporting communication, UX/UI, usability testing or surveys, acting on ELA's behalf. Access is limited to the personal data necessary for the performance of the specific activity.

Categories of the data recipients
1. ☒ A natural or legal person 2. ☐ Public authority 3. ☐ Agency 4. ☒ Any other third party, specify Click here to enter text. Specify who has access to which parts of the data:

- Information Sector: full access to the tester pool
- Contractors: access limited to the personal data necessary for the implementation of a specific activity and only in accordance with ELA's documented instructions and applicable contractual arrangements.

Description*Click here to enter text.***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,	
Country(ies) to which the data is transferred	<i>Click here to enter text.</i>
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	
Names of the international organisations to which the data is transferred	<i>Click here to enter text.</i>
3. Legal base for the data transfer ☐ Transfer on the basis of the European Commission's adequacy decision (Article 47) ☐ Transfer subject to appropriate safeguards (Article 48.2 and .3), specify: 2. (a) ☐ A legally binding and enforceable instrument between public authorities or bodies. Standard data protection clauses, adopted by (b) ☐ the Commission, or (c) ☐ the European Data Protection Supervisor and approved by the Commission, pursuant to the examination procedure referred to in Article 96(2) . (d) ☐ Binding corporate rules, ☐ Codes of conduct , ☐ Certification mechanism pursuant to points (b), (e) and (f) of Article 46(2) of Regulation (EU) 2016/679, where the processor is not a Union institution or body. 3. Subject to the authorisation from the European Data Protection Supervisor: ☐ Contractual clauses between the controller or processor and the controller, processor or the recipient of the personal data in the third country or international organisation. ☐ Administrative arrangements between public authorities or bodies which include enforceable and effective data subject rights.	

☐ Transfer based on an **international agreement** (Article 49), specify
[Click here to enter text.](#)

Derogations for specific situations (Article 50.1 (a) –(g))

☐ N /A

☐ Yes, derogation(s) for specific situations in accordance with article 50.1 (a) –(g) apply (ies).

In the absence of an adequacy decision , or of appropriate safeguards, transfer of personal data to a third country or an international organisation is based on the following condition(s):

- (a) ☐ The data subject has explicitly consented to the proposed transfer, after having been informed of the possible risks of such transfers for the data subject due to the absence of an adequacy decision and appropriate safeguards
- (b) ☐ The transfer is necessary for the performance of a contract between the data subject and the controller or the implementation of pre-contractual measures taken at the data subject's request
- (c) ☐ The transfer is necessary for the conclusion or performance of a contract concluded in the interest of the data subject between the controller and another natural or legal person
- (d) ☐ The transfer is necessary for important reasons of public interest
- (e) ☐ The transfer is necessary for the establishment, exercise or defense of legal claims
- (f) ☐ The transfer is necessary in order to protect the vital interests of the data subject or of other persons, where the data subject is physically or legally incapable of giving consent
- (g) ☐ The transfer is made from a register which, according to Union law, is intended to provide information to the public and which is open to consultation either by the public in general or by any person who can demonstrate a legitimate interest, but only to the extent that the conditions laid down in Union law for consultation are fulfilled in the particular case

Description

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: *Click here to enter text.*)
- External website ☒ (URL: **EUSurvey**)

☐ Other form of publication, specify

Click here to enter text.

☐ 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:

Click here to enter text.

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.