



European Labour Authority

DATA PROTECTION OFFICER

RECORD OF PROCESSING OPERATIONS ON PERSONAL DATA

DPR-ELA-2025-0012 ELA Database of Innovative Digital Solutions

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

Record reference	DPR-ELA-2025-0012
Title of the processing operation	ELA Database of Innovative Digital Solutions
Controller entity	European Labour Authority, Operations Department, Coordination and Liaison (NLOs and Brussels Office) 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 Microsoft Ireland South County Business Park, One Microsoft Place, Carmanhall and Leopardstown, Dublin, D18 P521, Ireland. Insight Technology Solutions Belgium Inc., Romeinsesteenweg 468, 1853 Grimbergen, Belgium. Avanade, Guildensporenpark 76, Block H, 9820, Merelbeke, Belgium 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 or Refulation (EU) 2018/17125
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 Description

The Coordination and Liaison (NLOs and Brussels Office) Sector collects, processes and uses personal data to manage the ELA Database of Innovative Digital Solutions, an online platform accessible to national authorities of EU Member States, external stakeholders, and the European Commission ("the Commission"). This portal comprises three key components:

(a) a public repository of papers submitted through ELA's public open "Call for Papers", featuring contributions from diverse society sectors and audiences (e.g., industry and academia) on topics concerning the digitalization in labour mobility, social security coordination, risk analysis, and cross-border employment, to name a few;

(b) a secure and restricted-access repository, which is a result of ELA's Market Studies with national authorities on different innovative technologies, showcasing digital solutions and tools related to innovation and digitalization, implemented by Member States and accessible exclusively to them and the Commission (Digital Solutions Exchange);

(c) a Back office as the secure administrative environment of the platform, accessible only to authorised ELA staff and designated contractors. It is used for managing user accounts, processing submissions, maintaining system integrity, and performing compliance checks. Access is limited to authorised personnel and contractors operate exclusively within ELA-controlled environments. Personal devices or external systems are not permitted;

ELA stores the submitter's name and email address in the restricted database, based solely on their consent, to:

- allow ELA staff to contact the submitter if clarifications or follow-up information are needed;
- allow ELA staff to share the submitter's name and email with a requesting Member State authority or authorised stakeholder, when they need to directly contact the submitter for more details regarding the submitted use case.

Access to the platform is granted based on users' roles and responsibilities and is limited to what is necessary for the performance of their tasks.

Different access levels are assigned to the various user groups of the platform, including ELA staff, the European Commission, Member State authorities, National Liaison Officers (NLOs), authorised contractors and external users, where applicable.

The public repository is accessible to all users for published content. Access to the Digital Solutions Exchange is restricted to authorised users from ELA, the European Commission and Member State authorities for cooperation, information exchange and mutual learning purposes. Access to the administrative environment is limited to authorised ELA staff and authorised contractors involved in the operation, maintenance and administration of the platform.

User access rights are assigned, maintained and reviewed in accordance with ELA's internal procedures and governance framework. Activities performed within the platform may be subject to monitoring and oversight to ensure compliance with applicable legal, regulatory and organisational requirements.

Purpose

The initiative is part of ELA's approach to Innovation and Facilitation of Digitalisation. Its overall purpose is to foster mutual learning and promote the use of innovative digital tools that enhance labour mobility, social security coordination, and the efficiency of public services for citizens and companies across the Union.

In line with Recital (25) and Article 2 of Regulation (EU) 2019/1149, the database supports ELA's mandate by facilitating cooperation and information exchange among Member States, and by promoting the use of innovative information technology in the context of fair labour mobility and digital transformation.

1.2.1 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
Anonymization
- Encryption
- Collecting minimum set of personal data

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
Manual input of data: Other Microsoft Applications, such as Power BI, Outlook, Microsoft Graph.

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
Microsoft Dataverse is a cloud-based relational database platform that powers data storage and management across the Microsoft Power Platform and Dynamics 365.

1.2.5 Comments on the processing of the data

The technical solution consists of an integrated online platform designed to support ELA's governance, coordination and outreach activities. Only limited personal data is processed, where necessary for the operation and management of the platform and its users.

The platform is organised into distinct components serving different operational purposes. These components operate within ELA-managed cloud-based environments and are subject to appropriate organisational and technical arrangements to ensure that the processing of personal data remains proportionate, secure, and compliant with applicable data protection requirements:

1. Public Repository (call for papers)

- **Storage & processing location:** Hosted in ELA's production environment within the EU-based, ELA-managed cloud infrastructure.
- **Infrastructure:**
Runs on the main public-facing environment of the platform to ensure accessibility and visibility for external audiences. No sandboxing is applied to maintain seamless publication workflows.

2. Digital Solutions Exchange

- **Storage & processing location:** Hosted in ELA's secure internal environment, physically and logically segregated from public-facing systems.
- **Infrastructure:**
Implemented as a controlled and access-restricted module within the platform, but with restricted access layers.

3. Back Office (administrative environment)

- **Storage & processing location:** Operates exclusively within ELA's protected administrative environment, accessible only through ELA-managed devices and tools.
- **Infrastructure:** Operates in a restricted administrative environment within ELA's secure infrastructure, separated from public and internal repositories for operation and compliance tasks.

Overall data processing approach

The platform follows a data minimisation approach, ensuring that only personal data necessary for the specified purposes is collected and processed. Appropriate technical and organisational measures are implemented across all components of the platform to ensure a level of security appropriate to the risks associated with the processing, in accordance with ELA internal policies and applicable legal requirements.

The platform is organised into separate public, restricted, and administrative environments, supporting the confidentiality, integrity, availability, and proper governance of the information processed while meeting ELA's operational needs.

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 of the Coordination and Liaison (NLOs and Brussels Office) Sector authorised to manage the portal - National Liaison Officers (NLOs)
2. External to organisation	☐ N/A	

	☒ Yes	Data subjects	
		Public Repository	- External contributors/authors submitting papers, - Co-authors or affiliated researchers - Institutional contact persons from academia, industry, or other organisations
		Digital solutions exchange	- Representatives of national authorities of EU Member States, - Representatives of the European Commission

1.3.2 Data categories/fields

The platform processes different types of data depending on the repository and access level:

1. (Public Repository) External contributors/authors submitting papers, co-authors or affiliated researchers, Institutional contact persons from academia, industry, or other organisations

- Identity and contact details: first name, last name, country, email address, submitted materials (papers, presentations, supporting documents), insofar as they contain identifiable information;
 - Professional information: institution name and department.
- For the call for papers, the following record applies: ['DPR-ELA-2022-0035 ELA call for papers, proposals or ideas'](#).

2. (Digital solutions exchange) Representatives of national authorities of EU Member States, National Liaison Officers (NLOs), Representatives of the European Commission

- Identity and contact details: first name, last name, country, email address;
- Professional information: institution name and department.
- For registration purposes: data collected and processed by EU Login:

The EU Login is covered by Record ['DPR-ELA-2023-0014 Identity & Access Management Service - EU Login'](#).

3. (Back office) ELA staff members, ELA contractors operating exclusively within ELA-controlled environments

- Identity and contact details: first name, last name, country, email address of both the submitters and the presenters;
- Professional information: institution name and department, role for submission and review workflows.

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'

The data being processed contain sensitive data which fall(s) under Article 11 'criminal convictions and offences'	N/A ☒ Yes ☐
Description:	

1.4 RETENTION PERIOD

Data category	Retention period
Public repository data (published content and contributor details)	All personal and operational data processed within the platform will be retained for a maximum of five (5) years from the date the use case or paper is uploaded to the module.
Digital solutions exchange module (submission workflows and related metadata)	All personal and operational data processed within the platform will be retained for a maximum of five (5) years from the date the use case or paper is uploaded to the module.
Back Office data (administrative records and system logs)	All personal and operational data processed within the platform will be retained for a maximum of five (5) years from the date the use case or paper is uploaded to the module.

Description

Once maximum time of retention has been reached, data will be securely deleted or anonymised, unless required for legal or regulatory obligations.

1.5 RECIPIENTS

Origin of the recipients of the data	
1. ☒ Within the EU organization	• Authorised ELA staff within the Coordination and Liaison (NLOs and Brussels Office) Sector on a "need-to-know basis" • National Liaison Officers (NLOs)
2. ☒ Outside the EU organization	• Authorised Staff of the European Commission - DG EMPL (EESSI team) on a "need-to-know basis" • Representatives of national authorities of EU Member States • General Public can have access to the public repository
Categories of the data recipients	
1. ☒ A natural or legal person 2. ☒ Public authority 3. ☒ Agency 4. ☐ Any other third party, specify	

Description: The data processed within the platform may be accessed by the following categories of recipients, depending on their role and repository:

Authorised ELA staff within the Coordination and Liaison (NLOs and Brussels Office) Sector

- For operational management, review workflows, and compliance activities.
- Access is limited, role-based and restricted to authorised personnel on "a need-to-know basis".

Authorised Staff of the European Commission (DG EMPL – EESSI team)

- Access to the Public Repository and Digital solutions exchange module for oversight, coordination, and policy-related activities.
- Access is limited to functions aligned with ELA's governance on "a need-to-know basis".

Representatives of national authorities of EU Member States, National Liaison Officers (NLOs)

- For cooperation and information exchange within the scope of ELA's mandate.

General Public Access (Public Repository Only)

- Published use cases, papers, and contributor identification (name and organisation) are accessible to all users.

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
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).

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 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>)

☒ Other form of publication, specify

Reference for Data subjects which leads to the privacy statement is available directly on the Portal.

☒ 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.

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 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.