European Labour Authority

DATA PROTECTION OFFICER

RECORD OF PROCESSING OPERATIONS ON PERSONAL DATA

DPR-ELA-2022-0027 Personal Data on ELA corporate web presence

1 PART 1: PUBLIC - RECORD (ARTICLE 31[1])

1.1 GENERAL INFORMATION

Record reference	DPR-ELA-2022-0025
Title of the processing operation	Personal Data on ELA corporate web presence
Last updated	***November 2026***
Controller entity	European Labour Authority, Operations Department, Information and EURES Unit, 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 European Commission, Directorate General Informatics (DG DIGIT) 1049 Brussels, Belgium. Authorised external service providers supporting the operation, hosting, maintenance and analytics of the ELA corporate website, where applicable. *Such processors are bound by contractual arrangements, including data protection clauses, defining their respective responsibilities and obligations in accordance with Regulation (EU) 2018/1725.*
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) collects and uses personal information for the management of the European Labour Authority (ELA) main website.

The ELA main website offers various types of content aimed at informing the general public about the work of the ELA, ranging from general information, news, events, background information, official documents, policy information, links to specialised tools and applications. The ELA main website also aims to engage with users. Users can contact specific ELA staff through individual or functional mailboxes. Contacting ELA staff through a mailbox will activate web visitor's email software to send requests and comments to a specific mailbox.

The website also uses cookies and similar technologies to support its technical functioning and security, remember users' preferences and, subject to users' prior consent for non-essential cookies and similar technologies, analyse website usage and user interactions to improve its usability, accessibility, content, performance and overall user experience.

Users can also access tools to opt-in to take part in surveys and/or register for events. In both cases, specific privacy statements apply for each such opt-in, outside the website.

In particular, the ELA main website displays personal data (name, profession, CV, contact details) of some people that are internal to the organisation. This includes: ELA senior management as well as staff working in the field of external communication or staff assigned to a particular activity / project / task / event for which communication via the internet is required. Other staff if communication on their achievements or contribution to ELA activities includes the publication of their personal data.

The ELA main website also publishes the list of people that are external to the organisation as members of the ELA Management Board and Stakeholder Group or members of the different Working Groups in the Authority to inform the public about their tasks and its composition.
The specific Privacy Statements apply for these collections of personal data (Record "*DPR-ELA-2023-0004 ELA Working Groups*").

The ELA main website publishes as well names of the representatives of organisations, self-employed individuals and their collaborators/employees present at meetings with the ELA Executive Director for transparency reasons (more information about this process in Record "*DPR-ELA-2023-0011 Publication of meetings with interest representatives and other externals*").

As the European Commission is the system supplier (processor from a personal data protection point of view), for further information, please see also DG COMM "*Record DPR-EC-00083 on processing of personal data on European Commission web sites*" (within the europa.eu domain), including IP addresses, by visitors of the publicly available websites.

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: Collection of only the data necessary for the relevant website functionality or analytics purpose, masking of identifiers where applicable, exclusion or masking of personal data in website interaction data, prior consent for non-essential cookies and similar technologies, and access restricted to authorised persons on a need-to-know basis.

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
   Automated collection, storage and analysis of technical information and website usage and interaction data through cookies and similar technologies.

2. ☒ Manual processing
   a. ☒ Word documents
   b. ☒ Excel sheet

Description

The general public can also provide anonymous feedback on the visited page(s), report bugs/technical issues, and send spontaneous comments on the content.

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

Description:

Personal data provided by website visitors when writing emails to relevant individuals or functional mailboxes that are published on some webpages on the ELA main website is stored on the relevant Outlook server/database only in order to reply.

The Europa Web Publishing platform is hosted on a cloud server managed by DIGIT (please see record DPR-EC-00083 - Processing of personal data on European Commission web sites (within the europa.eu domain), including IP addresses, by visitors of the publicly available website). All content, including user details and personal data, is stored on this cloud.

1.2.5 Comments on the processing of the data

Website cookies are implemented in accordance with the ELA Cookie Policy and, where applicable, the European Commission Webtools framework. The ELA corporate website uses strictly necessary cookies, preference cookies and analytics technologies, including Europa Analytics (Matomo) and, where applicable, other authorised analytics tools, to support the secure operation of the website and to produce aggregated statistical information for website improvement purposes.
Non-essential cookies and analytics technologies are activated only after the user has provided consent through the website cookie banner.

1.3 DATA SUBJECTS AND DATA CATEGORIES

1.3.1 Data subjects' categories

1. Internal to organisation	-Head of Units -Executive Director
2. External to organisation	-Members of the ELA Management Board -Members of the WG of ELA/Stakeholder Group -Website visitors who access and browse the ELA corporate website

1.3.2 Data categories/fields

Indicate the categories of data that will be processed:
ELA Management Board: name, last name, organisation, address of organisation, position in organisation, country.

ELA senior management: name, last name, (academic/job) title, function, personal bio and CV, publications, ELA unit, work email address, work phone number, personal picture, and any other information the data subject choses it publish.
Consent form of ELA staff to use personal data on the website.

Experts of the Stakeholder Group and different Working Groups:
Name, last name, country/delegation, status (member/alternate), affiliation/organisation).
Meetings and related documents may be published. The specific privacy statements of the different working groups will apply.

Representatives of organisations, self-employed individuals and their collaborators/employees present at meetings with the ELA Executive Director: name, last name, organisation, date and title of the event and minutes. The specific privacy statement will apply.

Website visitors: technical, preference and website usage data processed through cookies and similar technologies

Any other person who is related to the ELA work and may therefore be reference in ELA publication and content on the ELA main website.

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.

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 […].

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** ☐

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**
All data categories	During the mandate as representative of the respective Member States/EU Institution/Organisation. Once the member is no longer performing these activities, his/her personal data (described under the identification data) will be deleted.
Website visitors' cookie and analytics data	Retained for the periods specified for each technology and data category in the ELA Cookie Policy and the dedicated Privacy Statement.

Description
Data subjects can always request the deletion of their data by contacting the controller at compliance@ela.europa.eu.
Data subjects can contact the ELA to be informed about its data protection rights at data-protection@ela.europa.eu.
Data subjects can request additional information about the Authority or its activities at info@ela.europa.eu.

1.5 RECIPIENTS

Origin of the recipients of the data	
1. ☒ Within the EU organization	-Authorised ELA Staff with access to the content management system (CMS) and analytics
2. ☒ Outside the EU organization	-General public -Any website visitor who can access the published information entered into the content management system (CMS). -The European Commission and authorised service providers supporting website hosting, maintenance and analytics, to the extent necessary for their respective tasks. - Authorised external service providers supporting the operation, maintenance, hosting and analytics of the ELA corporate website.

Categories of the data recipients
1. ☒ A natural or legal person 2. ☒ Public authority 3. ☒ Agency 4. ☒ Any other third party, specify

Description

Published website (front-end) and Content management system (CMS, back end): Any website visitor who can access the published information entered into the content management system (CMS). ELA staff with access to the content management system (CMS) do not have access to any other personal data than that published on the website. When it comes to other personal data such as cookies and IP addresses related to website visits, ELA staff with access to the CMS does not have access to such data, but only to aggregated data via Europa Analytics.
The European Commission will have access to the cookies' information but only aggregated data is shared with ELA staff on a need to know basis.

Website analytics technologies other than Europa Analytics are operated with the support of authorised external service providers, under the management and oversight of authorised ELA staff.

For e-mails:
The visitor's own email programme opens an email window when the user decides to send an email to the ELA. This process will be covered by Record DPR-ELA-2022-0006 "External complaints in the field of European labour mobility".

In some specific cases, the consent for the publication of your personal data will be specifically gathered. For these cases, a specific consent form will be sent for your approval. In these cases, the provision of your personal data will not be mandatory.

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

1.7 INFORMATION TO DATA SUBJECTS ON THEIR RIGHTS

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

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)

☒ 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 to all visitors.

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.