EUROPEAN LABOUR AUTHORITY

PROTECTION OF YOUR PERSONAL DATA

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

Processing operation: ELA web user research: online survey and follow-up interviews

Data Controller: European Labour Authority, Information and EURES Unit, Information Sector

Record reference: DPR-ELA-2022-0022

Table of Contents

1. **Introduction**
2. **Why and how do we process your personal data?**
3. **On what legal ground(s) do we process your personal data?**
4. **Which personal data do we collect and further process?**
5. **How long do we keep your personal data?**
6. **How do we protect and safeguard your personal data?**
7. **Who has access to your personal data and to whom is it disclosed?**
8. **What are your rights and how can you exercise them?**
9. **Contact information**
10. **Where to find more detailed information?**

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 in the context of "ELA navigation and card sorting UX research". 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 "ELA navigation and card sorting UX research", in particular. This user research activity supports the project of improvement of the corporate website carried out by ELA, with the aim of collecting feedback from users.

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

Purpose of the processing operation: The external contractor, NETCOMPANY - INTRASOFT SA on behalf of ELA Information Sector collects and uses your personal information to obtain relevant knowledge on the user experience related to the ELA website. The data are used to feed the Authority's performance monitoring framework including external evaluations and performance indicators and for learning and improvement purposes.

Participants in this user research are invited from ELA's volunteer pool of testers (record reference number: DPR-ELA-2026-0007). The pool is used to identify and contact potential participants for testing, consultation and user research activities.

The research consists of an online survey and follow-up interviews with selected participants. The survey collects feedback on users' journeys and experiences with the ELA website. Some participants may subsequently be invited to a follow-up interview to provide more detailed feedback on their experience and interaction with the website. Participants for the follow-up interviews will be selected based on their professional role.

The activity uses the Commission's online questionnaire tool EUSurvey that requires you to login via your 'EU Login'. 'EU Login' requires certain personal data such as the name, surname and e-mail address of the registrant. For further information, please refer to the privacy statements of 'EU Login' and 'EU Survey' as well as the processing operations 'Identity & Access Management Service (IAMS)' (reference number in the public DPO register: DPR-EC-03187) and 'EUSurvey' (reference number: DPR-EC-01488).

Participation in the survey and in any follow-up interview is voluntary.

A user research activity is necessary to obtain the users' feedback on their journeys and experiences on the ELA website, in order to inform the ELA further user experience improvements projects.

Your 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)(d) of Regulation (EU)2018/1725, you have given consent to the processing of your personal data for one or more specific purposes.

We do not process **special categories of personal data**, therefore, Article 10 of the abovementioned Regulation does not apply.

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

Only personal data necessary for participation in the study will be collected and processed. In order to carry out this processing operation, NETCOMPANY - INTRASOFT SA on behalf of ELA Information Sector collects the following categories of personal data, depending on whether you participate in the online survey and/or a follow-up interview.

For the online survey, the following categories of personal data may be processed:

- job category
- country of residence
- information about previous engagement with ELA, including participation in ELA events, workshops or other activities
- personal data included in the response or contribution to the study, including (personal) opinions
- consent form

If you are selected and agree to participate in a follow-up interview, the following additional personal data may be processed:

- your current professional role or job position, where necessary for the research
- responses, feedback, comments and opinions provided during the interview
- interview notes
- audio/video recording and/or transcript of the interview

Furthermore, respondents may spontaneously provide other, non-requested personal data in the context of their reply to a targeted research activity. In all other cases, it is the responsibility of the respondents who opted for confidentiality of their personal data to avoid any reference in the submissions that would reveal their identity.

The provision of personal data is not mandatory.

5. How long do we keep your personal data?

Personal data collected in the context of this user research will be kept only for as long as necessary for the purposes described above and, in any event, for no longer than 12 months after completion of the user research activity.

Survey responses collected through EU Survey will be retained for 12 months after the completion of the user research activity. Personal data collected in the context of the follow-up interviews, including interview responses, notes and transcripts or recordings, will be stored in ELA's secure SharePoint environment and retained for the same period.

Upon completion of its tasks, NETCOMPANY - INTRASOFT SA will delete any personal data stored in its own systems and will no longer have access to the personal data processed in the context of this research activity. Access to personal data retained by ELA will be restricted to authorised staff on a need-to-know basis.

At the end of the applicable retention period, personal data will be deleted or anonymised.

In case of publication of replies to the survey, after obtaining explicit consent of the data subject, data could be kept for 5 years.

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.

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?

Access to your personal data is provided to ELA staff responsible for carrying out this processing operation and to authorised staff according to the "need to know" principle. Such staff abide by statutory, and when required, additional confidentiality agreements.

The external contractor staff will have access to specific parts of the personal data on a need to know basis during the performance of the survey and the interviews.

When explicitly agreed by you, some of your personal data (the views expressed by the respondents to the survey, job category or country of residence of the respondent) will be published on a publicly available website on a Europa website, either as received, in the form of a summary report, included in a wider policy document, or printed to illustrate communication material, etc.

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 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 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 the processing of your personal data for the purposes of this research activity. 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, *communication@ela.europa.eu*.

The Data Protection Officer (DPO) of ELA

You may contact the Data Protection Officer (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) 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-2022-0022: ELA Public consultations/Survey/Questionnaires/Quiz