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 AI Chatbot - Labour Mobility Information and Rights Assistant (MIRA)

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

Record reference: DPR-ELA-2026-0011

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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 ELA collects, handles and ensures protection of all personal data provided, how that information is used and what rights you have in relation to your personal data. 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 AI Chatbot - Labour Mobility Information and Rights Assistant (MIRA)**", undertaken by the Operations Department, Information and EURES Unit, Information Sector, is presented below.

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

Purpose of the processing operation: The European Labour Authority, Operations Department, Information and EURES Unit, Information Sector, collects and uses your personal information to give you access to relevant and reliable information on labour mobility and related rights within the European Economic Area (EEA).

MIRA enables users to submit questions and receive responses based on selected official and publicly available EU and national sources. It helps users identify and understand information relevant to cross-border employment and labour mobility, while providing references to the underlying official sources. The processing also includes the collection and analysis of user feedback to evaluate and improve the quality, accuracy and usability of the service.

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?

ELA processes your personal data, because:

(a) processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Union institution or body;

In accordance with Article 5(2) of Regulation (EU) 2018/1725, the Union law supporting this processing is Regulation (EU) 2019/1149 establishing a European Labour Authority, in particular:

- Article 4(a), which entrusts ELA with facilitating access to information in accordance with Article 5;
- Article 5, which mandates ELA to improve the availability, quality and accessibility of general information concerning rights and obligations in the field of labour mobility;
- Article 5(a), concerning information on individuals' rights and obligations in cross-border labour mobility situations;
- Article 5(c), concerning support to Member States in providing access to and disseminating information on free movement of workers, social security coordination and posting of workers, including through references to national information sources.

(d) 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 Regulation does not apply.

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

In order to carry out this processing operation, the Information and EURES Unit, Information Sector collects the following categories of personal data:

User identification and access-control data: Identification data received through the EU Login integration, including email information used to assess access eligibility. Email addresses are retained in the authorised-user list where individual access approval is required.

User roles and permissions: Roles and permissions assigned in the admin console and SharePoint knowledge-management site.

Conversation content: Personal data that may be included in users' questions, MIRA's responses and the associated conversation context, relating to users or other individuals.

Feedback and associated interaction data: Positive or negative ratings, selected reasons, optional comments, and the conversation up to the point of feedback submission, including the question and response being evaluated; supporting references, hyperlinks and extracts; interaction date and time; and the domain component of the user's email address. The full email address is not retained with feedback.

Application access and security logs: Source IP addresses, timestamps, user identifiers, application session or correlation identifiers, access outcomes, administrative actions, and security events or alerts.

Personal data in knowledge-base sources: Personal data contained in selected official and publicly available sources, processed when incorporating these sources into the knowledge base, retrieving information and generating responses.

The provision of identification data necessary for access control is required to access MIRA. Without these data, ELA cannot verify your eligibility and grant you access to the service. Providing feedback is voluntary. If you choose to submit feedback, the conversation up to the point of submission is retained with your feedback. Choosing not to provide feedback does not affect your access to or use of MIRA.

If you submit feedback, MIRA automatically masks any personal data it detects in your optional comment and in the conversation up to the point of submission before storing that content with your feedback. Only authorised personnel may review the stored feedback.

5. How long do we keep your personal data?

The ELA Information and EURES Unit, Information Sector only keeps your personal data for the time necessary to fulfil the purpose of collection or further processing, namely for:

Email addresses retained for individual access approval: For the duration of your individual access authorisation. Your email address is removed from the authorised-user list when that authorisation expires or is withdrawn.

User roles and access permissions: For the duration of the relevant role assignment. Permissions are updated or removed when responsibilities change or the authorisation ends.

Conversations: Conversation content is held in session memory and deleted when the chatbot conversation session is closed. If you submit feedback, the conversation up to that point is retained with the feedback record for six months from the date the record is stored in the database.

Application access and security logs: One year from the creation of each log entry.

Feedback records and associated interaction data: Six months from the date the feedback record is stored in the database.

6. How do we protect and safeguard your personal data?

Personal data processed in connection with MIRA are stored on secure servers and cloud infrastructure operated by ELA or its contracted service providers. Technical and organisational measures are implemented to protect personal data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure or access, taking into account the risks associated with the processing.

Access to personal data and administrative functions is restricted to authorised personnel on a need to-know basis. Role-based access controls determine the data and functionalities available to each user according to their assigned responsibilities. Private networking and VPN controls restrict administrative access to the underlying infrastructure.

If you submit feedback, MIRA automatically masks any personal data it detects in your optional comment and in the conversation up to the point of submission before storing that content with your feedback. Only authorised personnel may review the stored feedback.

Application access and security logs support security monitoring, detection of unauthorised or anomalous activity, incident investigation and operational troubleshooting. Access to these logs is restricted to authorised personnel responsible for the relevant technical and security tasks.

Service providers processing personal data on behalf of ELA are subject to contractual obligations concerning data protection, confidentiality and information security and act in accordance with ELA's documented instructions. The applicable measures are reviewed periodically to assess their continued effectiveness.

If you submit feedback, MIRA automatically masks personal data it detects in your comment and in the conversation up to that point before storing them with your feedback. Access to the stored feedback for review is restricted to authorised personnel.

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.

In particular:

Within the EU organisation: Authorised ELA staff responsible for the operation, administration and support of MIRA, according to the need to-know principle and their assigned access permissions. These include designated staff of the Information and EURES Unit (Information Sector) and the ICT sector.

Outside the EU organisation: Authorised personnel of the following service providers may access personal data where necessary to perform their contractual tasks on behalf of ELA.

-Microsoft Ireland Operations Limited, providing the cloud services used by MIRA.

-CAN-ARHS Consortium, comprising Accenture NV/SA and ARHS Developments S.A., providing the contracted technical services.

Access is subject to ELA's instructions, assigned access permissions and contractual data-protection and confidentiality obligations.

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.

The information ELA collects will not be given to any third party, except to the extent and for the purpose ELA may be required to do so by law.

8. What are your rights and how can you exercise them?

You have consented to provide your personal data to ELA Information and EUREs Unit, Information Sector for the current processing operation. You can withdraw your consent at any time by notifying the Data Controller. The withdrawal will not affect the lawfulness of any processing carried out prior to the withdrawal.

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, you may contact the Data Controller: information@ela.europa.eu

- **The Data Protection Officer (DPO) of ELA**

You may contact the Data Protection Officer (data-protection@ela.europa.eu) 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/her. You may access the register via the following link: Privacy policy | European Labour Authority.

This specific processing operation has been included in the DPO's public register with the following Record reference: DPR-ELA-2026-0011 ELA AI Chatbot - Labour Mobility Information and Rights Assistant (MIRA)