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: Personal Data on ELA corporate web presence - **Website Analytics using Hotjar/Contentsquare**

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

Record reference: DPR-ELA- 2022-0027

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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 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. 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 **"Personal Data on ELA corporate web presence (Website Analytics using Hotjar/Contentsquare)"**, 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: European Labour Authority, Information and EURES Unit, Information Sector collects and uses your personal information to analyse how visitors interact with the ELA corporate website in order to improve its usability, accessibility, navigation, content structure and overall user experience.

Hotjar/Contentsquare will be used as a behavioural analytics tool solely for the purpose of analysing anonymised user interaction patterns and improving the structure, navigation, content and overall digital experience of the ELA corporate website. The tool will support the analysis of user behaviour and website performance from a user experience (UX) and business perspective.

More specifically, the processing aims to:

- identify navigation bottlenecks and usability issues;
- understand user behaviour on key pages and user journeys;
- improve website content structure, accessibility and user experience;
- support data-driven optimisation decisions regarding website design and content;
- increase efficiency in identifying and resolving digital experience issues.

Hotjar/Contentsquare collects anonymised and aggregated information through the following functionalities:

- **Heatmaps:** capturing clicks, scroll depth and on-page movement patterns;
- **Session Recordings:** analysing user navigation behaviour, including clicks and scrolling during a session, with all keystrokes and form inputs fully masked client-side;
- **Funnels:** analysing progression through page steps, identifying drop-off points and related session metrics to improve content flow and accessibility.

The collection and analysis of these data cannot lead to the identification of individual users. The collected data are not shared with marketing or commercial organisations and are used exclusively for website optimisation and user experience improvement purposes.

Hotjar/Contentsquare is integrated via the same Webtools module, following the same implementation rules as the EC Core.

Hotjar/Contentsquare service is disabled by default and activated only after the user has provided explicit consent through the website cookie banner.

For more information on how we use cookies please see **Cookies | European Labour Authority**

Your personal data will *not* be used for an automated decision-making including profiling.

Processors:

Hotjar Ltd. - Provider of the user behavior analytics platform and direct data processor
Dragonara Business Centre, 5th Floor
Dragonara Road
Paceville, St. Julian's STJ 3141
Malta

Amazon Web Services EMEA Sàrl - Infrastructure sub-processor providing secure cloud hosting and data storage within the EEA
One Burlington Plaza
Burlington Road
Dublin 4, D04 RH96
Ireland

Content Square SAS - Parent company of Hotjar Ltd., providing unified corporate governance, legal compliance and commercial infrastructure
7 rue de Madrid
75008, Paris, France

Such processors are bound by contracts defining the terms of service, including personal data protection clauses indicating their responsibilities as provided by Regulation (EU) 2018/1725.

3. On what legal ground(s) do we process your personal data?

We process your personal data, because, according to Article 5(1) of Regulation (EU) 2018/1725:

(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.
(d) The data subject has given consent to the processing of his or her personal data for one or more specific purposes.

If you decide not to consent to the collection of cookies you will not be prevented from browsing the website.

If you are authorised ELA staff member who has access to the tool, the processing of your personal data is necessary for the performance of a task carried out in the public interest.

We do not collect special categories of data, therefore, Article 10 of Regulation (EU) 2018/1724 does not apply.

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

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

- Authorised ELA staff within the Information Sector managing and monitoring the tool: First name, last name, professional e-mail address, user role, access logs

- Website visitors who access and browse the publicly accessible European Labour Authority (ELA) website and consent to the use of the Hotjar/Contentsquare analytics cookie:

- **Identification data:** IP address of visitor to the audited web or mobile site (masked at the point of collection; not stored at rest), pseudonymous visitor and session identifiers, including identifiers stored in cookies or session storage, as used by the enabled functionalities.
- **Behavioral data:**
  -Click activity, scroll depth and mouse movement patterns (heatmaps);
  -Navigation behaviour, time spent, content interaction, scrolling activity and interaction flows during browsing sessions (session recordings);
  -Progression through website pages or content steps, drop-off points and related session analytics (funnels);
  -Page interaction metrics and user journey patterns used for website usability and performance analysis.
- **Technical data**: Pages visited on the website or application, Browser type and version, Device type and operating system, Screen resolution, language settings and browser viewport information, JavaScript errors and other backend technical diagnostic data necessary for website performance analysis.
- **Geolocation data:** location of the visitor to the audited site limited to city level.

All the information collected is immediately and automatically anonymised to keep only statistical data that cannot be related to any specific user.

The provision of personal data is not mandatory. If you do not consent to the use of the Hotjar analytics cookie, no personal data will be collected through Hotjar/Contentsquare and your access to and use of the ELA website will not be affected.

5. How long do we keep your personal data?

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:

Visitors' data categories: Retained for a maximum period of 13 months from the date of initial collection. Visitors can withdraw their consent to the use of non-essential analytics cookies at any time through the cookie banner. Following withdrawal of consent, no further behavioural analytics data are collected through the Hotjar/Contentsquare cookie.

Authorised ELA staff data categories: Retained for up to 1 month after termination of the contract with the processor.

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

ELA as Controller: 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.

Hotjar as Processor: Hotjar Ltd. implements a range of technical and organisational measures to ensure the security and confidentiality of the behavioural analytics data processed on behalf of ELA. All data collected under the ELA configuration are stored exclusively on Amazon Web Services (AWS) servers located in Ireland (EU), in line with industry-standard security controls. Data are processed within the European Union and protected through industry-standard security measures, including encryption during transmission and privacy-enhancing techniques where applicable. Hotjar does not track or record users who have cookies disabled. Further information about Hotjar's privacy and security measures is available at: **https://help.hotjar.com/hc/en-us/articles/36819972898193-Data-Safety-Privacy-Security**.

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.

Internal to organisation:

Authorised ELA staff within the Information Sector managing and monitoring the tool**.**

External to organisation:

- Amazon Web Services EMEA SARL (Ireland): Provides the cloud infrastructure used to host and process Hotjar data.

Under the approved configuration, Hotjar data are collected, processed and stored on AWS servers located in Ireland (EU). No international transfers of personal data are expected, provided that optional modules and integrations remain disabled.

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 the right to object to the processing of your personal data, which is lawfully carried out pursuant to Article 5(1)(a) on grounds relating to your particular situation.

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-2022-0027 Personal Data on ELA Corporate Web Presence**