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: European Job Days - Mobile Application (EJD Mobile App)

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

Record reference: DPR-ELA-2022-00013

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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 European Job Days Mobile Application (EJD Mobile App), undertaken by the European Labour Authority, Information and EURES Unit, is presented below.

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

Purpose of the processing operation: The European Labour Authority, Information and EURES Unit, collects and processes your personal data to support intra-EU labour mobility by facilitating cross-border matching between jobseekers and employers and enabling participation in virtual and on-site recruitment events within the EURES framework.

The purpose of the processing through the EJD Mobile App is to provide jobseekers with mobile access to selected services of the European Job Days platform. Personal data are processed to enable users to create and manage accounts, profiles and CVs, search and apply for vacancies, register for and participate in EJD events, communicate with employers and access EURES support services.

Personal data are also processed to authenticate users, ensure the security, maintenance and proper functioning of the application, resolve technical issues and produce authorised usage statistics.

The EJD platform and Mobile App: The EJD website is a platform for virtual (online) and on-site job fairs where employers can publish their company profiles and current job opportunities. Jobseekers can indicate their interest in specific job offers by making their

user profile and CV visible to the employers they have selected. In virtual events, presentations can be streamed online, and jobseekers, employers and EURES staff can communicate with each other via live chats. Specific information regarding the processing and protection of data submitted in chats is provided in connection with the chat functionality.

The European Job Days service is also available through the EJD Mobile App, which complements the EJD website by providing mobile access to European Job Days services, events, job opportunities and related information, allowing users to engage with EJD activities through their mobile devices.

The EJD Mobile App provides jobseekers with mobile access to selected services of the EJD platform and uses the same user-account and jobseeker database as the EJD website. Through the application, users can browse vacancies and events, create or log in to their EJD account, manage their profile and CV, apply for vacancies, participate in European Job Days events and contact EURES support services. Users may also browse vacancies and events and access publicly available information without creating an account.

Job vacancies displayed in the EJD Mobile Application are retrieved through the EURES Job Vacancy API. Vacancy records may contain personal data relating to employers or employer representatives, such as contact names, email addresses, or telephone numbers. These data are not collected directly by ELA through the EJD Mobile Application but are provided through the EURES network by authorised data providers. EURES Members, Partners and other vacancy providers are responsible for ensuring that any personal data contained in vacancy records are published and shared in compliance with applicable data protection legislation and that any necessary permissions or consents have been obtained before the data are made available through EURES.

Account registration, profiles and applications: Jobseekers and employers who register for a European Job Day event obtain a user account on the EJD website for that event.

Jobseekers can create their personal profile, specify their preferences, and upload and manage their CVs either through the EJD website or directly through the EJD Mobile App. They can apply directly for job vacancies and, where the relevant functionalities are available, schedule online or face-to-face interviews with employers and communicate with them through live chat.

Employers registered on the EJD website can access a jobseeker's CV and other profile information only where the jobseeker has expressed an interest in that employer or has applied for one of its vacancies.

EURES Advisers, as members of the EURES network, may access jobseekers' profiles and CVs where necessary to provide support and facilitate European Job Days events in the organising and co-organising countries. This access enables them to provide guidance, facilitate candidate-employer matching and present relevant profiles during events. Access is limited to authorised persons with a legitimate need to process the information within the EURES framework.

Event Organisers, who may also be EURES Advisers, may access personal data, including relevant CV information, where necessary to organise and manage a specific European Job Day event. This may include coordinating candidate–employer matches, interviews, chats and presentations. CV information is made available to Event Organisers only to the extent necessary for event organisation and facilitation. It may also be made available to authorised EURES members in the relevant countries and verified employers, subject to the access conditions described above.

In cases where an employer further processes personal data obtained through the EJD platform for its own recruitment purposes, the employer will be considered a separate controller and will be responsible for complying with Regulation (EU) 2016/679 (GDPR), including the obligation to provide the relevant information to data subjects under Articles 13 and 14 and, where applicable, to maintain records of processing activities under Article 30.

The modes of processing include both automated and manual processing. Automated processing is used only to provide and operate the functionalities of the EJD platform and the EJD Mobile App.

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Certain functionalities use information contained in a jobseeker's profile, CV and selected preferences to identify potentially relevant vacancies or facilitate matching with employers. Information such as education, skills, languages, work experience, sectors of interest and preferred occupations is compared with job requirements using predefined rules to generate a rule-based matching score indicating how closely the jobseeker's profile aligns with a given vacancy. This automated evaluation constitute profiling.

The matching score supports also jobseekers in identifying potentially relevant vacancies, for example by highlighting or ordering job offers according to their compatibility with the

jobseeker's profile. Employers may also see the score when reviewing an application. In both contexts, the score serves an informational purpose and does not, in itself, determine application or recruitment outcomes.

Therefore, the EJD platform and the EJD Mobile App do not take decisions based solely on automated processing, including profiling, that produce legal effects concerning users or similarly significantly affect them within the meaning of Article 24(1) of Regulation (EU) 2018/1725. Automated functionalities are used only to support the identification of potentially relevant opportunities or candidates. Any subsequent decisions remain the responsibility of the employer and jobseeker and involve continuous human assessment, with the matching score provided for information only.

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:

(d) you have given consent to the processing of your personal data for one or more specific purposes.

Please note that, depending on the information you choose to include in your CV, this may contain special categories of personal data within the meaning of Article 10 of Regulation (EU) 2018/1725, such as data concerning your health (e.g. disability-related information).

If you choose to include such information about yourself, we will ask for your explicit consent through a separate checkbox.

We process the special categories of personal data only where the following condition under Article 10(2) of Regulation (EU) 2018/1725 is met:

(a) you have given explicit consent to the processing of those personal data for one or more specified purposes.

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

In order to carry out this processing operation, the European Labour Authority, through its Information and EURES Unit, collects and further processes the following categories of personal data:

Account and identification data (mandatory): First name, last name, username, authentication information, account identifiers, preferred language, nationality.

Contact data: Email address, telephone number, where collected, contact details included

by the user in a profile or/and CV.

-Mandatory fields: First name, Last name, Country of Residence, Nationality, Language Skills, Education Level, Employment Status, Work Experience, Sector, Occupation, Country of residence, level of education, employment status and total work experience.

-Other optional profile information: Profile picture, gender, age group, field of education, skills, language skills, employment preferences and other information voluntarily included in the profile.

Gender, age group, level of education and country of residence are collected for statistical purposes.

CV and supporting-document data: Uploaded CVs and their contents, supporting documents, and files or profile content selected or captured by the user through the device's file storage, photo gallery or camera.

Vacancy and application data: Vacancies viewed or selected, applications submitted, indications of interest in employers or vacancies, and information relating to interviews or other recruitment interactions, where the relevant functionality is used.

Event and communication data: Event registrations and participation information, enquiries submitted to EURES support services, chat or communication information, contact details exchanged through the applicable EJD functionality.

Employer and organisation data: First and last name of the representative, email address, telephone number, organisation name, description and type, country, sector, organisation logo, where it identifies or relates to an individual. Names, email addresses and telephone numbers of employers or employer representatives included in job vacancies displayed in the EJD Mobile App are obtained through the EURES Job Vacancy API from authorised data providers within the EURES network and are not collected directly from employers through the application.

EURES Adviser and Event Organiser data: First name, last name, username, email address, telephone number, country, professional role and organisation-related information.

Technical, device and application data: Device and application identifiers, application version, operating-system information, authentication information, application settings and user preferences, IP address, network connection information, security, diagnostic and error logs, crash reports, application performance information, and locally stored application data and cache files.

Usage and analytics data: Interactions with the application, sections visited, technical characteristics of the device, application performance metrics, Matomo analytics data and

aggregated statistics from Android and iOS application stores, insofar as these constitute personal data. Matomo is an analytics tool used to measure and analyse how users interact with the EJD website and mobile application in order to improve their functionality and performance.

Mobile-device permissions and access: Where enabled by the user: access to the camera, photo gallery and file storage for uploading documents or profile content, microphone access where audio functionality is available.

*Where enabled by the user, camera and microphone access supports audio and video calls through **Whereby.** Whereby is a video conferencing service used to enable online interviews, meetings and live interactions between participants of European Job Days events. Whereby may process live audio and video streams through its infrastructure to transmit the call, without storing them beyond the temporary processing necessary for transmission. Further information is available in **Whereby Privacy Policy.***

4. How long do we keep your personal data?

The European Labour Authority, through its Information and EURES Unit, retains personal data only for as long as necessary to fulfil the purposes for which they were collected or further processed.

The applicable retention periods are as follows:

EJD account and associated data: Personal data are retained for as long as the corresponding account remains active. These data are deleted after 5 consecutive years of inactivity, counted from the date of the last account activity, unless deleted earlier by the account holder. Jobseekers may modify or delete their data through the EJD platform or the EJD Mobile App.

Locally cached application data: Locally cached application data remain on the user's device until deleted by the user, the application or the operating system.

Usage analytics: Usage analytics associated with a user account are retained until the account is deleted or the user withdraws consent to analytics.

Technical, security and diagnostic logs: Technical, security and diagnostic logs generated through the EJD Mobile App, including crash reports processed through Sentry, are retained for 90 days from their creation and are automatically deleted thereafter.

5. 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, in accordance with Regulation (EU) 2018/1725 and the applicable data protection obligations imposed on processors acting on behalf of Union institutions, bodies, offices and agencies.

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.

Communications between the EJD Mobile App and the EJD backend systems are protected through secure communication protocols. Appropriate technical and organisational measures are also implemented to protect authentication credentials, uploaded documents and other personal data processed through the application.

6. 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.

Access to your personal data is restricted to authorised persons according to the "need-to-know" principle and is limited to the information necessary for their respective tasks.

ELA staff: Access is provided to authorised ELA staff responsible for carrying out this processing operation. Such staff are bound by statutory and, where required, additional confidentiality obligations.

The Information and EURES Unit has no access to jobseekers' profiles. Its access is limited to event organisers' contact details and aggregated event-related data provided through a specific form.

EJD Mobile App users: All EJD Mobile App users, including those without an account, may access the professional contact details of EURES Advisers. They may also view names, email addresses and telephone numbers of employers or employer representatives where these are included in publicly available vacancies retrieved through the EURES Job Vacancy API and displayed in the application. Jobseekers and employers may request each other's contact details.

EURES Advisers and EURES Members: EURES Advisers may access jobseekers' profiles and CVs where necessary to provide guidance, facilitate candidate–employer matching and support European Job Days events in the organising and co-organising countries. Information contained in jobseekers' CVs is also made available, for display purposes, to EURES Members in those countries. If these organisations reprocess the CV information obtained, this processing has to be in compliance with Regulation (EU) 2018/1725 and the General Data Protection Regulation (Regulation (EU) 2016/679), and they will be considered independent controllers.

Event Organisers: Event Organisers, who may also be EURES Advisers, may access personal data, including relevant CV information, where necessary to organise and manage a specific European Job Day event. This may include coordinating candidate–employer matches, interviews, chats and presentations. Access is limited to the information necessary for event organisation and facilitation.

Employers: Only registered, verified and accepted employers may access a jobseeker's CV and other profile information where the jobseeker has expressed an interest in that employer or applied for one of its vacancies, in accordance with the applicable EJD access rules. Jobseekers may also make their CV available to an employer by providing their registration code through the chat functionality.

External contractor: Authorised personnel of the external contractor acting on behalf of ELA may access personal data to operate, maintain and support the EJD platform and the EJD Mobile App and facilitate the organisation of events. Access is limited to the information necessary for their tasks, according to the "need-to-know" principle.

Cookies Policy[1].

The controller will transfer your personal data to the following recipients in a third country or to an international organisation in accordance with Regulation (EU) 2018/1725: We will transfer personal data to EEA countries and Switzerland.

According to 2000/518/EC: Commission Decision of 26 July 2000 pursuant to Directive 95/46/EC of the European Parliament and of the Council on the adequate protection of

personal data provided in Switzerland (notified under document number C(2000) 2304), Switzerland has an adequate level of protection of personal data.

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.

7. 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 provide your personal data to the European Labour Authority, Information and EURES Unit for the present processing operation. 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.

8. 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: mailto:eures@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.

9. 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(opens in a new tab).

This specific processing operation has been included in the DPO's public register with the following Record reference: **DPR-ELA-2022-0013 European Job Days (EJD) – Web Portal and Mobile Application**