

## PROTECTION OF YOUR PERSONAL DATA

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

**Processing operation:** Social Media Use by the European Labour Authority

**Data Controller:** European Labour Authority, Governance and Coordination Unit, Communications Team (ELA Communications Sector)

**Record reference:** DPR-ELA-2022-0026.2

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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 "DPR-ELA-2022-0026: Social Media Use by the European Labour Authority" undertaken by the European Labour Authority, Governance and Coordination Unit, Communications Team (ELA Communications Sector) is presented below.

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

Purpose of the processing operation: The ELA Communications Sector collects and uses your personal information to inform the social media audience about ELA policies and activities, raise awareness about the ELA initiatives and engage directly with citizens and general audience by replying to their comments and questions.

The European Labour Authority collects and uses personal information to understand how social media users discuss its policies and initiatives. For this purpose, we process and analyse only publicly available data from posts by authors that have agreed to the terms and conditions of the various social media platforms that the ELA uses, in particular: Twitter, LinkedIn, Youtube, EU Voice, EU Video and Facebook. Data gathered through social media is used for the following activities:

- a. **Engaging:** acquiring knowledge of the audience's questions and responding to them;
- b. **Targeting and advertising:** expanding the number of audiences aware of EU policies and engagement opportunities (for instance participation in the EU policy making);
- c. **Identifying and collaborating with influencers** (defined by reach, number of followers, engagement and topic) who can be multipliers of the ELA's activities;
- d. **Reporting and optimisation:** analysing the performance of posts and allowing ELA's social media communication and engagement to improve and
- e. **Media monitoring tools:** The ELA does not use of any external social media monitoring tools. When monitoring ELA social media accounts, the ELA relies solely on the analytics built in the platforms and on statistics available publicly such as number of likes under a post. Social media users who interact with the ELA (for example commenting the ELA posts) do so after having agreed to the policies of those platforms.

*As part of the targeting and advertising ELA's activities, the Communications Sector uses the LinkedIn Lead Gen Forms to improve the interactions with you attending to your interest in ELA mandate, objectives and activities.*

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) (a) of Regulation (EU) 2018/1725, the 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.

#### Legal basis:

The personal data processing linked to the qualitative media monitoring analysis, including social media, as well as operating and maintenance of the European Labour Authority's social media presence are necessary for the performance of the European Labour Authority's tasks carried out in the public interest, as mandated by the Regulation (EU) 2019/1149 of the European Parliament and of the Council of 20 June 2019 establishing a European Labour Authority.

For the specific activities on **LinkedIn Lead Gen Form**, we rely on Article 5(1)(d) as you have consent to the processing of your personal data for this specific purpose.

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 ELA Communications Sector collects the following categories of personal data.

#### Personal data derived from the user profiles:

Identification data (name, username, user identification and geographical area)  
Personal characteristics (age, gender, family status, native language, nationality)  
Professional and educational background (occupation, company/organization, employment history, academic record, publications)  
Pictures and videos  
Engagement (amount of likes, favorites, comments, shares of users on a specific topic)

When using LinkedIn lead Gen Forms, the Communications Sector will receive user's LinkedIn profile when they interact with the specific event promoted.

#### Personal data available about users of social media platforms through their networks and connections

Reach  
Sentiments  
Comments  
Shares of users on a specific topic  
Networks and connections

Data from public figures (including European actors such as Members of the European Parliament on their public statements about EU topics or on ELA's activities or previous European Union Institutions mandated staff)

Any other information published on a website that is analysed or on a third-party platform.

Personal data available via audiovisual content that might be published on the social media platforms:  
Information in or about the content provided by a user (e.g. metadata), such as the location of a photo or the date a file was created, voice recordings, video recordings, or an image of a data subject;

While the external providers collect the personal data listed above, ELA Communications Team only analyses and uses aggregated data. However, individual quotes may be captured as examples and used to describe the general attitude towards the European Union and or the ELA in social media. These quotes are anonymised by removing the profile picture and name, except when they are by public figures, or individuals who publish posts about the European Union/ the ELA in their professional capacity or by influencers.

However, data from the social media platforms is not saved on any other systems that ELA uses. The data is only accessed via those social media platforms. Only aggregated data is being saved on ELA systems e.g. number of visitors, clicks, likes etc., their geographical location etc.

The provision of personal data is mandatory as mandated by the Regulation (EU) 2019/1149 . If you do not provide your personal data, we will not be able to fulfil in an efficient way our tasks.

## **5. How long do we keep your personal data?**

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

**Personal data derived from the user profiles and related personal data available through the users' networks and connections:** After initially being processed by the ELA Communications Sector or its processors personal data may be stored for a maximum period of 5 (five) years or, until a user deletes a social media account. Only aggregated and numeric values for performance measurement will be stored in order to preserve capability to provide reports.

**Personal data available via audiovisual content:** Selected audiovisual content may be archived for permanent preservation, in line with the provisions of the European Labour Authority Filing plan and specific retention list, for historical purposes to document, preserve and make available the history and audiovisual heritage of the European Labour Authority and the European Union.

**All paper and electronic records concerning the day-to-day correspondence, calls for proposals and/or interest together with the resulting contractual/financial files as well as reports containing aggregated data:** will be archived according to ELA Retention List and stored in ARES (Advanced Records System) under the responsibility of the European Commission, Secretariat-General (see Record DPR-EC-00536 / Management and (short- and medium-term) preservation of Commission documents) for a period of ten (10) years with the application of sampling and selection techniques.

## **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?**

The information being published on the ELA websites and Social Media can be accessed by any person in the world using the Internet or subscribing to Internet notification services.

## **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](mailto:communication@ela.europa.eu)

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

You may contact the Data Protection Officer ([data-protection@ela.europa.eu](mailto: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](mailto: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-2022-0026: Social Media Use by the European Labour Authority .