



**European Labour Authority**

DATA PROTECTION OFFICER

**RECORD OF PROCESSING OPERATIONS ON PERSONAL DATA**

DPR-ELA-2022- 0008 ELA access control, CCTV system and parking cards

**1 PART 1: PUBLIC - RECORD (ARTICLE 31<sup>1</sup>)****1.1 GENERAL INFORMATION**

<b>Record reference</b>	DPR-ELA-2022 -0008
<b>Title of the processing operation</b>	ELA access control system, CCTV system and parking cards
<b>Controller entity</b>	European Labour Authority, Resources Unit
<b>Joint controllers</b>	<input checked="" type="checkbox"/> N/A <input type="checkbox"/> YES, fill in details below
<b>Processor(s)</b>	<input type="checkbox"/> N/A <input checked="" type="checkbox"/> YES, fill in details below
<b>External organisation(s)/entity(ies) Names and contact details</b>	<input type="checkbox"/> N/A <input checked="" type="checkbox"/> YES <b>Owner of the building:</b> J&T REAL ESTATE, a.s. Dvořákovo nábrelie 10 811 02 Bratislava, Slovakia.  <b>Buidling Management:</b> Danube Facility Services, s.r.o. Dvorakovo nabrezie 10 811 02 Bratislava, Slovakia.  External Security services of the building Recepionist/Information clerk of the building  Microsoft Ireland South County Business Park, One Microsoft Place, Carmanhall and Leopardstown, Dublin, D18 P521, Ireland  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.
<b>Data Protection Officer Name and contact details</b>	Laura NUNEZ BAREZ Landererova 12, 811 09 Bratislava I Slovakia Email: data-protection@ela.europa.eu
<b>Corporate Record</b>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b>Language of the record</b>	English

<sup>1</sup> Pursuant to **article 31** of the new data protection regulation for EU institutions and bodies (**Regulation (EU) 2018/1725**) each controller and processor have to maintain a **record of processing activities** under its responsibility that contains at least the information listed under that article.

## 1.2 PURPOSE AND DESCRIPTION OF THE PROCESSING

### 1.2.1 Purpose

This process of personal data is necessary to:

- allow entrance to Landererova 12 (L12) building and the European Labour Authority premises
- keep track of how many people are in the building for evacuation purposes
- report on the number of visitors
- have a continuous surveillance of the presence of individuals on the site

Staff will be assigned one card (branded Mifare DESFire EV2), which will be provided by the owner of the building. These cards can be encoded for access to the ELA Offices from the main lift lobby and the emergency staircase. An additional card will be assigned for parking spaces.

Visitors will be issued a visitor pass by the L12 reception and these can access the ELA lift lobbies via the lifts, but entry to the ELA Premises will be by escort who will open the ELA Office entry doors from the lift shaft lobby.

There will be a Badge Reader at all lift shaft and stairwell doors at both entry and exit.

#### **CCTV (Closed-circuit television)**

There will be CCTV camera's covering each entry door and emergency escape doors inside the lease premises.

The Cameras will cover one or two entrances and only capturing people entering the office.

The recordings must make faces fuzzy unless a specific Administration account is used to enable clear playback.

### 1.2.2 Rules and Regulation of the Landererova 12 are in place and binding towards all the persons staying in the building. Processing for further purposes

- Archiving in the public interest
- Scientific or historical research purposes
- Statistical purposes

Safeguards in place to ensure data minimisation

- Pseudonymisation
- Any other, specify

The recordings make faces fuzzy unless a security code is entered to enable clear playback.

### 1.2.3 Modes of processing

1.  Automated processing (Article 24)
  - a.  Computer/machine
    - i.  automated individual decision-making , including profiling
    - ii.  Online form/feedback
    - iii.  Any other, specify

For parking purposes, plate recognition (vehicle identification registration) is in place, in case data subjects voluntary agree to share the vehicle/car plate number with the Building Management.

2.  Manual processing
  - a.  Word documents
  - b.  Excel sheet
  - c.  Any other, specify

### 1.2.4 Storage medium

1.  Paper
2.  Electronic

- a.  Digital (MS documents (Word,Excel, PowerPoint), Adobe pdf, Audiovisual/multimedia assets, Image files (.JPEG, .PNG, etc.))
  - b.  Databases
  - c.  Servers
  - d.  Cloud
3.  External contractor premises

Data is hosted on ELA infrastructure

**1.2.5 Comments on the processing of the data**

Centralized IT processing, in particular:

1. Badge generation – processing of personal identification and authentication
2. Access control functions, events and alarms:
  - Date/time of badge crossing control points, intrusion detection,
  - Video and/or sound recording – security incidents or video/sound surveillance
3. Visitor management:
  - Pre-registration,
  - Personal identification and optical or other machine-reading of ID documents
4. Car park access and authorizations:
  - Vehicle identification registration and vehicle number plate

The Controller may transfer certain data to processors for the purpose of access badge production. Such data will be limited to what is strictly necessary for the purpose. The processor shall at all times be obliged to meet the requirements of Regulation (EU) 2018/1725, in particular its Article 29, and shall process that data solely for the purposes set out by the controller.

ELA staff are provided with the MS 365 Office products to be able to access work documents from different devices and locations, and to carry out ELA’s tasks.

The processing of personal data is aligned with the Rules and Regulation of the Landererova, 12. For this purpose, building also means any of its parts or components, shared premises and facilities, equipment, parking areas around the building, entrance gates, adjacent lands and adjacent roads in the surroundings of the building which are owned by the owner of the building and which are intended to be used along with the building.

**1.3 DATA SUBJECTS AND DATA CATEGORIES**

**1.3.1 Data subjects' categories**

1. Internal to organisation	ELA staff
2. External to organisation	<input checked="" type="checkbox"/> Yes Visitors External contractors Staff of other EU institutions and EU agencies External Security services of the building Receptionist/Information clerk of the building Building management and the SBS Control Room (emergency calls)

**1.3.2 Data categories/fields**

The following data may be processed (if and when applicable):

**For ELA Staff:**

Full name, Birth date, Photograph, Nationality, Address and other contact details, Staff number (unique identifier: staff number for ELA staff, Link type with the European Labour Authority – official, temporary agent, seconded national experts, national liaison officer, contractual agent, interimaire, trainee, Current working status – active, detached, long term absence, etc, E-mail, Contract number and contract end date, Access rights, Roles associated with system privileges and tasks

**For external data subjects:**

Full name, Birth date, Nationality, Address and other contact details, internal database number for EU institution/body staff, Link type with the European Labour Authority – contractor, visitor, retired staff, staff family member, etc., Place of work and/or visit, Visit date/access period, EU institution/body attached to, Office and tel/fax number(s) of the person visiting, E-mail, Identity document number and dates, Access rights, Employer contacts for subcontractors, Specific data related with roles within the ELA (e.g. press, diplomatic representation, security officer, safety officer, etc.)

In case of use of the parking space: On a voluntary basis, car plate number and specific card associated will be provided to Building Management for programming the parking access system.

**For all data subjects:**

Video images taken by the associated video surveillance system

In case of any incident, it will be reported as appropriate to the Security Service, SBS Control Room, Building Management and if needed, the police.

Not all data fields are necessarily processed or retained for each data subject. Fields processed or recorded are directly related to the kind of link the data subject has with ELA or the reason for presence.

**1.3.2.1 Special categories of personal data**

**Indicate if the processing operation concerns any ‘special categories of data’ which fall(s) under Article 10(1), which shall be prohibited unless any of the reasons under article 10(2) applies:**

**Yes , the processing concerns the following special category(ies):**

Data revealing

- racial or ethnic origin,
- political opinions,
- religious or philosophical beliefs,
- trade union membership,

Or/and,

- Genetic data, biometric data for the purpose of uniquely identifying a natural person,
- Data concerning health,
- Data concerning a natural person’s sex life or sexual orientation.

**N/A**

Description:

**If applicable, indicate the reasons under article 10(2) allowing the processing of the special categories of data:**

- (a)  The data subject has given explicit consent to the processing of those personal data for one or more specified purposes, [...].
- (b)  Processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security[...].
- (c)  Processing is necessary to protect the vital interests of the data subject or of another person where the data subject is physically or legally incapable of giving consent.
- (d)  Processing is carried out in the course of its legitimate activities with appropriate safeguards by a non-profit-seeking body which constitutes an entity integrated in a Union institution or body and with a political, philosophical, religious or trade-union aim [...].
- (e)  Processing relates to personal data which are manifestly made public by the data subject.
- (f)  Processing is necessary for the establishment, exercise or defense of legal claims or whenever the Court of Justice of the European Union is acting in its judicial capacity.
- (g)  Processing is necessary for reasons of substantial public interest, [...]
- (h)  Processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services [...].
- (i)  Processing is necessary for reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health or ensuring high standards of quality and safety of health care and of medicinal products or medical devices [...].
- (j)  Processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes [...].

#### Additional information

##### 1.3.2.2 Data related to 'criminal convictions and offences'

<b>The data being processed contain sensitive data which fall(s) under Article 11 'criminal convictions and offences'</b>	N/A <input checked="" type="checkbox"/> Yes <input type="checkbox"/>
<b>Description:</b>	

#### 1.4 RETENTION PERIOD

Indicate the administrative time limit(s) for keeping the personal data per data category, and if known, specify the start/end date, or describe the specific start/end moment of each time limit:

Data category	Retention period	Optional	
		Start date/moment	End date/moment
ELA Staff identification data	Data retention set to be until termination of the link between the data subject and the European Labour Authority plus 6 months (e.g.: end of contract plus 6 months).		

Visitors identification data (external data subjects)	Data will be deleted/anonymised 6 months later after the last action related to the visit.		
Vehicle plate number	Data retention set to be until the data subjects withdraw their data/return the parking card or linked to the termination of the link between the data subject and the European Labour Authority plus 1 month.		
CCTV images	Will be deleted after 2 week, in accordance with Slovak law.		

**Description**

Data older than the defined retention periods will be:

- a) Copied to an alternate system to be made anonymous and aggregated for statistical purposes, if considered useful, or
- b) Fully wiped from the IT operational systems.

CCTV images

Depending on the sensitivity of the controlled area, registration time is in average 7 days. In extremely sensitive, motion detection techniques are used with registration only when movement is detected. CCTV images will be deleted after 2 weeks.

**1.5 RECIPIENTS**

Origin of the recipients of the data	
1. <input checked="" type="checkbox"/> Within the EU organization	ELA staff from Resources Unit on a need to know basis
2. <input checked="" type="checkbox"/> Outside the EU organization	External Security services of the building Receptionist/Information clerk of the building Building Management Police

Categories of the data recipients	
1. <input checked="" type="checkbox"/> A natural or legal person	
2. <input checked="" type="checkbox"/> Public authority	
3. <input type="checkbox"/> Agency	
4. <input type="checkbox"/> Any other third party, specify	

**Description**

ELA staff data and visitors will be accessible to authorized ELA staff in Resources Unit, in order to organize the visit/entry into service.

Name, surname, ID card number or service card number, citizenship and proof of identity will be accessible to the Receptionist/information clerk of the building.

In case of an incident, personal data can be processed by the Service guard and Building Management and/or Police.

Vehicle plate number will be accessible to authorized ELA staff in Resources Unit and Building Management.

CCTV images will be only accessible to authorized staff from the Resources Unit on a “need to know basis” and in case of an incident may be handled to the relevant authorities. CCTV images are only available for the periods of recording.

## 1.6 INTERNATIONAL DATA TRANSFERS

<b>Transfer to third countries or international organisations of personal data</b>
<p><b>1. Transfer outside of the EU or EEA</b></p> <p><input checked="" type="checkbox"/> N/A, transfers do not occur and are not planned to occur</p> <p><input type="checkbox"/> YES,</p>
<p><b>2. Transfer to international organisation(s)</b></p> <p><input checked="" type="checkbox"/> N/A, transfers do not occur and are not planned to occur</p> <p><input type="checkbox"/> Yes, specify further details about the transfer below</p>
<p><b>3. Legal base for the data transfer</b></p> <p><input type="checkbox"/> Transfer on the basis of the European Commission's <b>adequacy decision</b> (<i>Article 47</i>)</p> <p><input type="checkbox"/> Transfer subject to <b>appropriate safeguards</b> (<i>Article 48.2 and .3</i>), specify:</p> <p>2. (a) <input type="checkbox"/> A legally binding and enforceable instrument between public authorities or bodies.</p> <p>Standard data protection clauses, adopted by</p> <p>(b) <input type="checkbox"/> the Commission, or</p> <p>(c) <input type="checkbox"/> the European Data Protection Supervisor and approved by the Commission, pursuant to the examination procedure referred to in Article 96(2) .</p> <p>(d) <input type="checkbox"/> Binding corporate rules, <input type="checkbox"/> Codes of conduct , <input type="checkbox"/> Certification mechanism pursuant to points (b), (e) and (f) of Article 46(2) of Regulation (EU) 2016/679, where the processor is not a Union institution or body.</p> <p>3. Subject to the authorisation from the European Data Protection Supervisor:</p> <p><input type="checkbox"/> Contractual clauses between the controller or processor and the controller, processor or the recipient of the personal data in the third country or international organisation.</p> <p><input type="checkbox"/> Administrative arrangements between public authorities or bodies which include enforceable and effective data subject rights.</p> <p><input type="checkbox"/> Transfer based on an <b>international agreement</b> (<i>Article 49</i>), specify</p>
<p><b>4. Derogations for specific situations</b> (Article 50.1 (a) –(g))</p> <p><input checked="" type="checkbox"/> N /A</p> <p><input type="checkbox"/> Yes, derogation(s) for specific situations in accordance with article 50.1 (a) –(g) apply (ies).</p> <p>In the absence of an adequacy decision , or of appropriate safeguards, transfer of personal data to a third country or an international organisation is based on the following condition(s):</p> <p>(a) <input type="checkbox"/> The data subject has explicitly consented to the proposed transfer, after having been informed of the possible risks of such transfers for the data subject due to the absence of an adequacy decision and appropriate safeguards</p> <p>(b) <input type="checkbox"/> The transfer is necessary for the performance of a contract between the data subject and the controller or the implementation of pre-contractual measures taken at the data subject's request</p>



- (c)  The transfer is necessary for the conclusion or performance of a contract concluded in the interest of the data subject between the controller and another natural or legal person
- (d)  The transfer is necessary for important reasons of public interest
- (e)  The transfer is necessary for the establishment, exercise or defense of legal claims
- (f)  The transfer is necessary in order to protect the vital interests of the data subject or of other persons, where the data subject is physically or legally incapable of giving consent
- (g)  The transfer is made from a register which, according to Union law, is intended to provide information to the public and which is open to consultation either by the public in general or by any person who can demonstrate a legitimate interest, but only to the extent that the conditions laid down in Union law for consultation are fulfilled in the particular case

**Description****1.7 INFORMATION TO DATA SUBJECTS ON THEIR RIGHTS**

<b>Rights of the data subjects</b>
<i>Article 17 – Right of access by the data subject</i>
<i>Article 18 – Right to rectification</i>
<i>Article 19 – Right to erasure (right to be forgotten)</i>
<i>Article 20 – Right to restriction of processing</i>
<i>Article 21 – Notification obligation regarding rectification or erasure of personal data or restriction of processing</i>
<i>Article 22 – Right to data portability</i>
<i>Article 23 – Right to object</i>
<i>Article 24 – Rights related to Automated individual decision-making, including profiling</i>

**1.7.1 Privacy statement**

The data subjects are informed about their rights and how to exercise them in the form of the a privacy statement attached to this record.

**Publication of the privacy statement**

Published on website

Web location:

- ELA internal website  (SharePoint on Personal Data protection )
- External website  (URL: <https://www.ela.europa.eu/en/privacy-policy> )

Other form of publication, specify

A standardised pictogram of video surveillance is clearly visible on the walls of all ELA entries at all times.

Guidance for Data subjects which explains how and where to consult the privacy statement is available and will be provided at the beginning of the processing operation.

Guidance on data subjects available in ELA's main website.

**Description:**

The data subjects can contact at any time the controller in order to consult or modify their data.

Visitors may address themselves to the controller requesting to exert such rights.

## 1.8 SECURITY MEASURES

Short summary of overall Technical and Organizational Measures implemented to ensure Information Security:

**Description:**

All data in electronic format (e-mails, documents, uploaded batches of data etc.) are stored either on the servers of the European Labour Authority or of its contractors.

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.