



**European Labour Authority**

DATA PROTECTION OFFICER

**RECORD OF PROCESSING OPERATIONS ON PERSONAL DATA**

DPR-ELA-2022-0018 ELA Loan management system for ICT equipment

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

<b>Record reference</b>	DPR-ELA-2022-0018
<b>Title of the processing operation</b>	ELA Loan management system for ICT equipment
<b>Controller entity</b>	European Labour Authority, Resources Unit, ICT and facilities (ELA ICT Sector)
<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 Microsoft Ireland South County Business Park, One Microsoft Place, Carmanhall and Leopardstown, Dublin, D18 P521, Ireland.
<b>Data Protection Officer</b> Name and contact details	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

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<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

The European Labour Authority (ELA) has established a loan management system for IT equipment to all ELA staff in the interest of the service coordinated and managed by the ICT Sector in the Resources Unit of the Authority.

This loan management system aims to:

- support safe, efficient and effective working from home;
- improve day-to-day administration and;
- ensure business continuity in the Authority.

Therefore, ICT equipment such as laptops, screens and smart phones can be borrowed, for use at home, in the office, for meetings or on mission, upon request via FMB: [ithelpdesk@ela.europa.eu](mailto:ithelpdesk@ela.europa.eu).

For this specific purpose, ELA ICT Team collects and uses borrowers' personal information only to associate it to the IT equipment that will be borrowed during a specific time frame.

The purpose of the processing is to keep track of the IT allocation equipment to a specific, identifiable, end user.

### 1.2.2 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

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

#### Description

Once a request for borrowing an IT equipment has been submitted via the FMB or the ICT Ticketing System, a confirmation notification is sent to the borrower and ELA ICT staff will prepare the IT equipment for the pick up date/send it via post mail.

When the borrower retrieves the IT equipment on the pick-up date, (s)he has to sign a paper document confirming that all relevant information were provided along with the IT equipment. The paper document is organisational safeguard to ensure the user cannot deny he/she received the IT equipment.

The same will apply to the upon return of the equipment.

**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

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

Before returning the equipment, the user should delete all information and data from the borrowed device (laptop, GSM, Digital camera etc). Specific guidelines are provided to ELA staff to ensure a proper usage of the item borrowed.

The Laptop will be re-initialised by the ICT Team on the day the laptop is returned and their account scheduled for deletion. Data will remain in the Microsoft Tenant for 30 days following the scheduled deletion of the account and will be completely erased after the 30 days, allowing a grace period of 30 days for the user to request access to recover any data required but not initially exported.

ELA ICT are expressly forbidden from accessing any data on user accounts, unless we have received express written permission from the Account holder to access their data.

After 30 days, the account and data will be irretrievably erased from the Azure environment.

**1.3 DATA SUBJECTS AND DATA CATEGORIES**

**1.3.1 Data subjects' categories**

1. Internal to organisation	<input checked="" type="checkbox"/> Yes ELA staff ELA ICT Team Head of Unit of Resources
2. External to organisation	<input checked="" type="checkbox"/> N/A

**1.3.2 Data categories/fields**

Indicate the categories of data that will be processed:

Borrower's name (and Requestor's name if applicable), Contact details of the borrower (and the requestor if applicable), professional email address, telephone number, office address, Unit/team of the borrower and the requestor if applicable, Request ID, Type of Equipment (Laptop Serial No, Laptop Asset Tag No, Laptop Model, Laptop arrival condition concerns), hand signature, date the equipment was loaned/returned, Laptop acceptance form.

**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,

<input type="checkbox"/> political opinions, <input type="checkbox"/> religious or philosophical beliefs, <input type="checkbox"/> trade union membership, Or/and, <input type="checkbox"/> Genetic data, biometric data for the purpose of uniquely identifying a natural person, <input type="checkbox"/> Data concerning health, <input type="checkbox"/> Data concerning a natural person's sex life or sexual orientation.  <input checked="" type="checkbox"/> N/A
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**1.3.2.2 Data related to 'criminal convictions and offences'**

The data being processed contain sensitive data which fall(s) under Article 11 'criminal convictions and offences'	N/A <input checked="" type="checkbox"/> Yes <input type="checkbox"/>
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**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
Request ID with borrowers' name and contact details (including the date of loan/return of the equipment)	30 Days after the returned of the equipment. After this period, only aggregated data will be kept for statistics.

**1.5 RECIPIENTS**

Origin of the recipients of the data	
1. <input checked="" type="checkbox"/> Within the EU organisation	ELA ICT Team ELA Head of Resources Unit

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

**Description**

All ELA ICT Team have access to the basic information of a request from users of their DG: borrower's name, contact details, IT equipment allocated and the time frame of the loan.  
Head of Resources Unit will have access to statistical data.

**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>

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

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

**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  (URL: <https://eulabourauthority.sharepoint.com/sites/PersonalDataProtection>)
- External website  (URL: <https://www.ela.europa.eu/en/privacy-policy> )

Other form of publication, specify

Privacy Statement will be available in the specific space of ICT Sector in the ELA Sharepoint.

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’ rights available on ELA main website.

**1.8 SECURITY MEASURES**

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

**Description:**

All personal data in electronic format (e-mails, documents, databases, uploaded batches of data, etc.) are stored on the Cloud based environments being used by European Labour Authority, at time of writing this is Microsoft Azure Cloud..

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 the EU Member States ('GDPR' Regulation (EU) 2016/679).

In order to protect personal data, 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.