



European Labour Authority

DATA PROTECTION OFFICER

RECORD OF PROCESSING OPERATIONS ON PERSONAL DATA

DPR-ELA-2023-0031: Consultation on EURES activities

1 PART 1: PUBLIC - RECORD (ARTICLE 31¹)

1.1 GENERAL INFORMATION

| | |
|---|---|
| Record reference | DPR-ELA-2023-0031 |
| Title of the processing operation | Consultation on EURES activities |
| Controller entity | European Labour Authority, Information and EURES Unit |
| Joint controllers | <input checked="" type="checkbox"/> N/A <input type="checkbox"/> YES, fill in details below |
| Processor(s) | <input type="checkbox"/> N/A <input checked="" type="checkbox"/> YES, fill in details below |
| Internal organisation(s)/entity(ies) Names and contact details | <input checked="" type="checkbox"/> N/A <input type="checkbox"/> YES |
| External organisation(s)/entity(ies) Names and contact details | <input type="checkbox"/> N/A <input checked="" type="checkbox"/> YES Personal data may be communicated to an external entity assisting ELA in fulfilling the objective for which data is managed. 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. <u>For M365 and ELA Cloud:</u> Microsoft Ireland South Country Business Park, One Microsoft Place, Carmanhall and Leopardstown, Dublin, D18 P521, Ireland |
| Data Protection Officer Name and contact details | Laura NUNEZ BAREZ European Labour Authority Landererova 12, 811 09 Bratislava I Slovakia Email: data-protection@ela.europa.eu |
| Corporate Record | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| Language of the record | English |

¹ 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 Information and EURES Unit aims to obtain feedback from the most relevant stakeholders in the EURES network (i.e. National Coordination Offices (NCOs), EURES Members and Partners and EURES Staff or any other interested actor). This process allows EURES to be able to contact their network and request their contributions through surveys on how to improve the network and the EURES related activities and it will imply the processing of personal data.

This processing will further allow the Information and EURES Unit to manage lists of stakeholders as contact points to collaborate with the ELA as part of a follow-up action.

The authentication of the user will be made with two-factor authentication system provided by EU Login. EU Login verifies the identity of the users and guarantees the security of their data. The process is covered by Record "DPR-EC-03187: Identity & Access Management Service (IAMS)" owned by the European Commission: Informatics (DIGIT). The European Labour Authority will not have access to these data.

1.2.2 Processing for further purposes

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

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
EU Survey

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

3. Any other mode, specify

Contributions to surveys would be gather, and, if needed, informal working groups to discuss will be created.

Description

Launch of surveys through the EU Survey platform.

Contributions collected an assessed. Depending on the need to follow up, informal working groups could be created to analyses specific issues related to the EURES activities.

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
4. Others, specify

1.3 DATA SUBJECTS AND DATA CATEGORIES

1.3.1 Data subjects' categories

| | |
|-----------------------------|--|
| 1. Internal to organisation | EURES Coordination Office staff on a need to know basis EURES and Information staff on a need to know basis |
| 2. External to organisation | NCOs Contact points nominated by the NCOs |

1.3.2 Data categories/fields

Indicate the categories of data that will be processed:

Identification data: Name, surname and contact details.

For the organisation of surveys:

Contact details: respondents who agree on a follow-up exchange will be asked to provide a contact person and his/her full name and contact details

E-mail address: linked to the EU-Login account of the user who will fill out the survey to identify that he/she is an authorized user to reply on behalf of the NCO and the NCO they are related to.

For the follow up of the survey:

Contributions, opinions and documents shared in the network.

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

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"/> |
| Description: | |

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 |
| Personal data collected in the course of conducting a survey | The fieldwork management team deletes personal data within a 12 (twelve) month period after the end of the survey. | Date of the launch of the survey | Close date of the survey |
| Name, surname and contact details | The data is kept as long as EURES continues to conduct follow-up exchanges, or until the data subject requests to be deleted from the list. | | |
| Creation of a Working Group (documents, contributions, opinions) | 12 (twelve) months after the creation of the Working Group | Date of the creation of the working group | Last contribution to the working group. |

1.5 RECIPIENTS

| Origin of the recipients of the data | |
|---|--|
| 1. <input checked="" type="checkbox"/> Within the EU organization | Authorised staff of the Unit/Team launching the survey and conducting the follow-up exchange |
| 2. <input type="checkbox"/> Outside the EU organization | |

| 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 |
| Specify who has access to which parts of the data: |

Description

Staff on a need to know basis in the Information and EURES Unit will have access to all data categories. Only aggregated data will be shared with other counterparts, the European Commission, EURES Members and Partners on NCOs.

1.6 INTERNATIONAL DATA TRANSFERS

| Transfer to third countries or international organisations of personal data |
|---|
| <p>1. Transfer outside of the EU or EEA</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>2. Transfer to international organisation(s)</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>3. Derogations for specific situations (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> |

1.7 INFORMATION TO DATA SUBJECTS ON THEIR RIGHTS

| Rights of the data subjects |
|---|
| <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: SharePoint on Personal Data Protection)
- External website (URL: <https://www.ela.europa.eu/en/privacy-policy>)

Other form of publication, specify

Specific privacy statement of the processing operation will be shared.

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.

Description:

Guidance on data subjects’ rights available in ELA main website under its privacy policy.

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 operation 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.