



**European Labour Authority**

DATA PROTECTION OFFICER

**RECORD OF PROCESSING OPERATIONS ON PERSONAL DATA**

DPR-ELA-2022-0019 ELA Work Programme activities

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

**1.1 GENERAL INFORMATION**

<b>Record reference</b>	DPR-ELA-2022-0019
<b>Title of the processing operation</b>	ELA Work Programme activities
<b>Controller entity</b>	European Labour Authority, Governance and Coordination Unit (ELA Governance Team)
<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>Internal organisation(s)/entity(ies) Names and contact details</b>	<input checked="" type="checkbox"/> N/A <input type="checkbox"/> YES
<b>External organisation(s)/entity(ies) Names and contact details</b>	<input type="checkbox"/> N/A <input checked="" type="checkbox"/> YES Microsoft Ireland South County Business Park, One Microsoft Place, Carmanhall and Leopardstown, Dublin, D18 P521, Ireland.
<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

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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) plans and executes its work following an annual Work Programme (WP) which is coordinated by the Governance and Coordination Unit.

This process allows ELA to plan, monitor and evaluate its scientific and technical support activities for the Commission, other EU Institutions, Member States and third parties.

This process helps the Authority to allocate human and financial resources to different work entities (projects), allow for clear indication of contact points for different work entities and facilitate the follow-up of time spent on different activities (especially in relation to contractual work).

Each year ELA prepares and presents a detailed work programme with its actions and activities for the upcoming year. The annual work programme is part of the Single Programming Document (SPD) of the Authority, which covers the overall strategic programming and resource programming for the next three years. The SPD has to be adopted by the Management Board and submitted to the European Commission, the European Parliament and the Council by 31 January each year.

The Authority also performs these activities through a specific application: **Operational Plan Application**. The Authority uses the Operational Plan Application to register, organise, plan, control and monitor its activities and their implementation in order to report and monitor their execution.

### 1.2.2 Processing for further purposes

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

### 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
2.  Manual processing
  - a.  Word documents
  - b.  Excel sheet
3.  Any other mode, specify  
Contributions from different Units of ELA are collected manually and organized/managed by ELA Governance Team.

### 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

The Operational Plan App will cover activities throughout 4 different phases:

- 1- Addition of planning items: in this phase, planned actions or projects will be recorded for any given year. As a result, the main/major actions/projects will be presented to the ELA Management Board for consultation and approval through the Single Programming Document. Upon approval, the year will be locked, and action items can proceed to the next phase.
- 2- Implementation phase: Once the year is locked, action items/activities can be created in this phase, also called phase 2, based on the activities registered on the previous phase. All the information previously entered is carried over to this phase. One can create multiple implementation items based on the planning item, conversely 1 planning item can originate 1 or more implementation items, in a parent child relation.
- 3- Execution phase: In this phase, called phase 3, items are monitored and relevant progress updates can be added as well as percentage of execution achieved already. This phase is also where you mark and implementation item as finished in order to signal its conclusion. Doing this the percentage is automatically set to 100% and the item/activity can move forward to next phase
- 4- Completed phase: In this phase, called phase 4, is where you can find all finished items/ activities.

### 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"/> N/A

#### 1.3.2 Data categories/fields

##### Personal data collected in the SPD:

Name and surname and comments and contributions to the report coordinated by the Governance and Coordination Unit.

##### Personal data contained in the Operational Plan App:

Name and surname, Unit, year, sector, strategic objective, Single Programming Document activity, action type, output type (such as report, minutes, summary or survey), planned/on demand activity, priority (1- Low, 2- Normal, 3- High), planned start and end date, title and short description

##### 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"/>
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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
All data categories	Personal data contained in the documents referred in this record will be deleted/removed as soon as they are not needed. In most of the cases, the personal data is only kept while the document is not final, while is a “working document” as a living document. Reference to any personal data is removed when the document is final. Documents will be kept without any personal data reference for 10 years.

**Description**

According to the ELA Specific retention list, point 1.5 related to Strategic programming and Reporting: Files related to the drafting of strategies, single programming documents and annual work programmes, including strategic plans, management plans, mid-term reviews, roadmaps as well as files related to the annual activity reports.

**1.5 RECIPIENTS**

Origin of the recipients of the data	
1.	<input checked="" type="checkbox"/> Within the EU organization ELA Staff on a need to know basis
2.	<input checked="" type="checkbox"/> Outside the EU organization Members of the ELA Management Board European Commission, European Parliament and The Council

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 on a need to know basis will have access to the preparatory documents and will be able to see other actors’ contributions and comments.

The Management Board will received the information related to each Unit and activity and will be directly informed by the Executive Director or the person responsible for each specific activity (Head(s) of Unit(s)/Sector(s)).

The European institutions (European Parliament, European Commission and the Council) will not have access to the personal data collected, only anonimysed and aggregated data will be presented.

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

Other form of publication, specify

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 will be available in ELA main website:  
<https://www.ela.europa.eu/en/privacy-policy>

**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 servers of the European Labour Authority or 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 the EU Member States ('GDPR' Regulation (EU) 2016/679).

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.