



European Labour Authority

DATA PROTECTION OFFICER

RECORD OF PROCESSING OPERATIONS ON PERSONAL DATA

DPR-ELA-2023-0027 EURES data and on-line job vacancies/advertisement analysis

1 PART 1: PUBLIC - RECORD (ARTICLE 31¹)

1.1 GENERAL INFORMATION

Record reference	DPR-ELA-2023-0027
Title of the processing operation	EURES data and on-line job vacancies/advertisement analysis
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 The management and development of the EURES portal: EURES IT Unit in the European Commission: Directorate-General/Service for Employment, Social Affairs and Inclusion, Unit A.4 IT Strategy and Solutions (DG EMPL.A.4) – Specific Data Processing Agreement in place.
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
Record Model	<input checked="" type="checkbox"/> N/A

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 European Labour Authority, Information and EURES Unit aims to better understand and improve the data quality of its database. For this purpose, the Information and EURES Unit will collaborate with the European Centre for the Development of vocational training ([CEDEFOP](#)) to analyse the data from online job advertisements (OJA) through the CEDEFOP online web tool for OJA data dissemination ([SkillsOVATE](#))¹.

Even though the data related to online job advertisement in the EURES portal should not contain personal data, there is a minimum risk that some of the data inserted in the free text categories (job description and benefits, job title and role) may contain personal data due to an error of the agent encoding the data (interoperability contact person, IOC/EURES Advisers).

This record aims to cover this remote scenario of transferring non-detected personal data.

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

At national level, the data is encoded by a initiating agent and revised by the relevant EURES advisor or a similar role in the EURES-partner organisation before it becomes public as defined in the EURES Interoperability Process Manual.

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

Automated processing of the data through the relevant tools available in the Cedefop. The system will analyse the data received and will analyse the relevant ones. If personal data were transferred by mistake, the system will automatically discard them.

2. Manual processing
 - a. Word documents
 - b. Excel sheet
3. Any other mode, specify
Web intelligence Hub Data production system

Description

Cedefop will use the web intelligence Hub Data production system to analyse the data obtained from the EURES Portal to:

- provide dedicated source-specific dashboards and/or direct access to processed data;
- assess the compatibility (overlap) of EURES with other OJA data sources;
- provide recommendations to ELA to improve data quality of the database; and
- provide analytical OJA-based information to stakeholders.

¹ SkillsOVATE is a project managed under the responsibility of the Department for VET and Skills at Cedefop, and the data production is organised under the umbrella of Eurostat's Web intelligence hub based on a Cedefop-Eurostat partnership.

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

Description:

The data will be stored in the EURES portal, ELA cloud and Cedefop servers.

1.3 DATA SUBJECTS AND DATA CATEGORIES

1.3.1 Data subjects' categories

1. Internal to organisation	ELA staff (contact points for Cedefop)
2. External to organisation	Cedefop staff (contact points for ELA) EURES jobseekers EURES employers EURES Advisers

1.3.2 Data categories/fields

For administrative reasons:

ELA Staff (contact points for Cedefop) and Cedefop Staff (contact points for ELA)
Name, surname ad contact details (e-mail and telephone)

For business processing:

Any personal data revealed by mistake. The cases detected so far, contained contact details such as e.g. personal e-mail, telephone and/or name of the contact person to be contacted for a specific job vacancy.

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: No cases detected. Special categories of data should not be registered in any of the fields required for this specific process.

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
Personal data related to administrative tasks	As long as the collaboration between the Agencies exists or the contact person is replaced.
Personal data related to the concrete business	As soon as the data is analysed by Cedefop, personal data (if any) will be disregarded.

Description

The collaboration between the two Agencies (ELA and Cedefop) for this specific project is expected to be finalised at the end of 2023.

1.5 RECIPIENTS

Origin of the recipients of the data	
1. <input checked="" type="checkbox"/> Within the EU organization	Cedefop Eurostat

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

Description

A Memorandum of Understanding (MoU) was signed between the European Labour Authority (ELA) and the European Centre for the Development of Vocational Training (Cedefop) where both agencies have agreed to cooperate on selected areas with a view to maximise synergies between them, avoid any potential duplication of activities and learning from each other through good practices.

Aggregated reports with no personal data (e.g. job shortages, surpluses) will be shared with [EUROSTAT](#) (the statistical office of the European Union) to improve the analysis, inform on better practices and existing synergies.

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: ELA Sharepoint on personal data protection)
- External website (URL: ELA main website)

Other form of publication, specify

The process will be described and Privacy Statement publicly available in the EURES portal.

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 on ELA main website: [here](#).

1.8 SECURITY MEASURES

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

Description:

After the commencement of the European Labour Authority's activity (August 1st, 2021) the Authority is replacing the European Commission (the "Commission") in managing the European Coordination Office of the European network of employment services (EURES).

However according to Article 6 of Regulation 2019/1149 establishing a European Labour Authority, the Commission will continue to ensure the provision of IT and the operation and development of IT infrastructure.

Commission Decision (EU, Euratom) 2017/46 of 10 January 2017 on the security of communication and information systems in the European Commission

Specific measures in place:

Databases and repositories operate on controlled access, limited to the persons needing it.

Access to the secured parts of the EURES application is controlled through an authentication and authorisation mechanism managed within the application.

Access to EURES environments from outside the European Commission is strictly limited to contractors responsible for the development and maintenance of EURES, through a Security Convention defined in collaboration with HR.DS.