European Labour Authority

DATA PROTECTION OFFICER

RECORD OF PROCESSING OPERATIONS ON PERSONAL DATA

DPR-ELA-2022-0032 ELA Intranet Collaborative Platform

1 PART 1: PUBLIC - RECORD (ARTICLE 31[1])

1.1 GENERAL INFORMATION

Record reference	DPR-ELA-2022-0032
Title of the processing operation	ELA Intranet Collaborative Platform
Controller entity	European Labour Authority, Governance and Coordination Unit
Joint controllers	☒ N/A ☐ YES, fill in details below
Processor(s)	☐ N/A ☒ YES, fill in details below
Internal organisation(s)/entity(ies) Names and contact details	☒ N/A ☐ YES
External organisation(s)/entity(ies) Names and contact details	☐ N/A ☒ YES **Unisystem S.M.S.A** 19-23 Pantou Alexandrou Street, 176 71 Kallithea Attica Greece **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.
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	☒ Yes ☐ No
Language of the record	English

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[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 provides an intranet platform for the active staff of the European Labour Authority, including social networking and collaboration tools.

This intranet platform will manage and allow for the consultation of latest corporate information personalized, access to internal information and systems via appropriate links, foster staff engagement, facilitate internal information dissemination and promote an easier and more effective collaboration and knowledge sharing about corporate information and activities.

The ELA home page (start page) delivers the latest corporate information and tools, and from there the users can easily access the corporate relevant information and tools of the Authority via appropriate links. From the Intranet homepage users can also navigate to the different intranet sections available that aggregate more specific corporate information about different units and sectors.

The Intranet hosts published corporate internal content (news, pages, documents, images, videos) and finalised version of documents in collaborative sites shared at the level of an organisational entity (Unit, Sector or team) or in a horizontal group of colleagues from various entities.

An user account, linked to a member of staff, represents a person using the application. Each user account has associated content, including the person's profile. The profile includes some administrative information, such as position, Unit, contact details (e-mail, telephone, office or groups followed) and information on recent files visited/modified or calendar). This is horizontal to Microsoft environment and SharePoint platform and thus is by definition also true inside the Intranet which in term is built using Microsoft technologies and SharePoint platform.

A special user group exists inside each intranet section, and also for the homepage, which is a user group with Full Control permission over the intranet section it belongs to and contains user accounts of staff that are called Intranet Teams Member whom are responsible for managing their own intranet section (eg: edit the intranet section menu, add or remove user accounts from the user group, create webpages and upload documents, manage permissions of document and folders, etc).

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

This is a centralised internal information corporate record. In practice this means that the processing activity described in this record is conducted for the whole Authority and covers the different Spaces created in there.

The following spaces have been created so far:
- Compliance
- Corporate support
- ICT
- HR
- Personal data protection
- Staff Committee
- Cooperation Support Unit
- Communications
- Governance
- Enforcement & Analysis
- Information & EURES
- Finance & Procurement
- AI @ ELA

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

Description:

External contractors will support the Authority implementing the relevant policies and legislation.

1.2.5 Comments on the processing of the data

Roles:
User
Administrator

Active directory

1.3 DATA SUBJECTS AND DATA CATEGORIES

1.3.1 Data subjects' categories

1. Internal to organisation	The primary population of users of the Sharepoint is the ELA active staff
2. External to organisation	ELA external contractors Staff from other European Institutions, Bodies or Agencies

1.3.2 Data categories/fields

The data fields of the data subject can be grouped along those types:

1. User identifier and data fields imported or reused from Sharepoint to build the core user profile, including the user's picture (for users who explicitly opted in SYSPER to have their picture visible on internal directories), ex: Position, Contact details -email, office location and telephone, content recently visited and interaction with colleagues;

2. Names/Pictures/videos/recordings of social events.

3. Names/Pictures/videos/recordings of professional meetings and events.

4. News published and pictures/videos/recordings included.

5. Access history and browsing activity.

6. Content management/publishing activity for Intranet Team Users: names of users & timestamps of creation + modification of each page/document or any other item of content.

ELA Intranet users do not have the possibility to limit or extend the visibility of their profiles. This choice is made by ELA Sharepoint administrators for the entire users population, and not for single users.

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 ☒ Yes ☐

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

User identifier and data fields imported into the Sharepoint to build the core user profile	*Deleted 1 month after the user (staff or service-provider) has left the institution.*
Content management/publishing activity	*Deleted 30 days after the item itself has been deleted.*
Names, pictures, videos and/or recordings of social events or professional meetings	*According to Record "DPR-ELA-2022-0023 ELA live, hybrid and digital events, seminars, workshops, conferences, meetings, open/celebration/information days and visits" photographs and audio visual material will be deleted within 2 years from the collection of the data. Please check the specific Privacy Statement of the event.*
News published and pictures/videos/recordings included.	*Deleted 30 days after the item itself has been deleted.*
Access history and browsing activity	*Deleted 1 month after the user (staff or service-provider) has left the institution. Backups are retained for 1 month.*

Description

As long a data subject remains a staff member of the European Labour Authority and the Intranet is in use, his or her account will be active and the automatically synchronized data will be filled in. When a member of the staff leaves the institution, his or her account is automatically deactivated.

Information included in the profile becomes visible to platform administrators and technical staff only.

There is no time limit to block/erase the data as the data subject remains in control of the data he has decided to insert. If the user account has been deactivated as a consequence of changes in the relation between the user and the ELA (mobility, end of contract, retirement, ...) the user will not have access to the platform and data will have to be manually removed upon request by a member of the technical staff.

Requests for changes in data coming from other sources such as Microsoft Active Directory have to be addressed to the owners of these sources.

1.5 RECIPIENTS

Origin of the recipients of the data	
1. ☒ Within the EU organization	ELA Staff
2. ☒ Outside the EU organization	ELA external contractors

Categories of the data recipients
1. ☒ A natural or legal person 2. ☐ Public authority 3. ☐ Agency 4. ☐ Any other third party, specify Specify who has access to which parts of the data:

Description

ELA staff have access the following fields of other users' profiles: Name, title, workphone & email, department, office location/building/number and Job position.

The technical team managing the Sharepoint, and therefore the Intranet, has overall access to the whole information stored on the platform: the supervision in place makes sure that the technical team acts exclusively for the improvement and maintenance and of the platform and secures + destroys any personal data which would be exported in the course of their technical operations.

Site owners/managers are bound to apply standards and settings, in particular to personal data protection and intellectual property rights concerns.

In case of an enquiry on suspected illegal activity of some users of the Sharepoint, HR.IDOC/HR.DS will receive user data and their activity, see DPR-ELA-2023-0022 ELA ICT security investigations related to investigations.

1.6   INTERNATIONAL DATA TRANSFERS

Transfer to third countries or international organisations of personal data
1. Transfer outside of the EU or EEA ☒ N/A, transfers do not occur and are not planned to occur ☐ YES,
2. Transfer to international organisation(s) ☒ N/A, transfers do not occur and are not planned to occur ☐ Yes, specify further details about the transfer below
3. Derogations for specific situations (Article 50.1 (a) –(g)) ☒ N /A ☐ Yes, derogation(s) for specific situations in accordance with article 50.1 (a) –(g) apply (ies).

1.7   INFORMATION TO DATA SUBJECTS ON THEIR RIGHTS

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

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

Internal Register of record ins 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 available on ELA main website : Your data subjects' 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.