



**European Labour Authority**

DATA PROTECTION OFFICER

**RECORD OF PROCESSING OPERATIONS ON PERSONAL DATA**

DPR-ELA-2022-0023 ELA live, hybrid and digital events, seminars, workshops, conferences, meetings, open/celebration/information days and visits

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

<b>Record reference</b>	DPR-ELA-2022-0023
<b>Title of the processing operation</b>	ELA live, hybrid and digital events, seminars, workshops, conferences, meetings, open/celebration/information days and visits
<b>Controller entity</b>	European Labour Authority, Resources Unit, Communication 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>External organisation(s)/entity(ies) Names and contact details</b>	<input type="checkbox"/> N/A <input checked="" type="checkbox"/> YES <p>In case of an organization by <b>an external company</b>, all personal data in electronic format (e-mails, documents, databases, 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 the EU Member States ('GDPR' Regulation (EU) 2016/679)</p> <p>In case of an organization with <b>any other EU Institution</b>, all personal data will be stored either in European Labour Authority servers or on servers of the European Union Institution involved in the specific event. All processing operations are carried out pursuant to Regulation (EU) 2018/1725.</p> <p>Additional details will be described in the specific Privacy Statement.</p> <p>Microsoft Ireland South County Business Park, One Microsoft Place, Carmanhall and Leopardstown, Dublin, D18 P521, Ireland</p> <p>In case of in-house events, the Security Service/ Receptionist receives a list of participants for access control and entrance permission purposes.</p>
<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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<b>Language of the record</b>	English

<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**

Organisation and management of events and visits with or without outside participants, including management of: lists for contacts, invitations, participants, entrance permission on European Labour Authority (ELA) premises, eventual reimbursement of experts, publication of reports, distribution of reports, feedback on reports, event follow-up, follow-up meetings, follow-up actions, information sharing, photographs/pictures, live webstreaming and/or audio and video recording publication on ELA intranets or the Internet and platform and tools used in case of digital or online events.

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

Personal data are collected through web forms and stored on ELA database servers.  
Filing system (on paper) in ad hoc files is also used within ELA Unit(s) involved in the coordination process of the event.

Sometimes registrations by Fax or Phone are accepted.

3.  Any other mode, specify

In case of digital events, the mode of processing depends on the platform and the tools which are being used to organise the event, including the use software to interact with the audience. Each platform and tool has a dedicated record of which the participants will be informed.

**Description****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

ELA staff are provided with the MS O365 Office products to be able to access work documents from different devices and locations, and to carry out ELA tasks.

**Description:**

Paper and electronic media on ELA servers.  
Cloud-based solution called Office 365 provided by Microsoft.

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

If it is envisaged that photographs and audiovisual footage of participants will be recorded or published afterwards, a specific consent, attached to this record, will be used. In these cases and according to available resources, the organizer could offer those participants special seats where no camera will point. Clear indication and information to hostesses will be provided for to correctly guide participants. In case of unavailable resources, those participants could locally follow live meeting and debates at the webstreaming Internet address indicated on the subscription form by the organizer. In some complex cases of events organisation, before registering for the event, the data subject has to read and accept the Privacy Statement which includes the following sentence: "*Photographs and audiovisual footage may be taken during the event and published thereafter. By agreeing to this privacy statement, you also agree to have your photograph and/or audiovisual footage taken and published by the European Labour Authority after the event*".

The publication of specific internal events images is also covered by the Record "DPR-ELA-2022-0027: Personal Data on ELA Corporate Web Presences".

For the purpose of eventual reimbursement of experts and participants' organisation, see record "DPR-EC-00301.1 Registration of Legal Entity and Bank Account records in the central EC Accounting System" (European Commission, DG BUDG)

The processing of contacts lists and network partners at ELA is covered by the Record "DPR-ELA-2022-0024: ELA Contact lists & network partners databases".

For platforms and tools used to organise and manage digital events, the following records will apply:  
DPR-EC-05006 Webex platform: Service de Web Conference (Webex),  
DPR-EC-05006 Microsoft Teams: EC M365 environment,  
DPR-EC-04966 Skype for business: Unified Communication and Collaboration (UCC),  
DPR-EC-02548 Slido - Audience Interaction Software

**1.3 DATA SUBJECTS AND DATA CATEGORIES****1.3.1 Data subjects' categories**

1. Internal to organisation	<input checked="" type="checkbox"/> Yes All internal people invited and participating to the "events" are subject to this record
2. External to organisation	<input checked="" type="checkbox"/> Yes All external people invited and participating to the "events" are subject to this notification

**1.3.2 Data categories/fields****Identification data:**

Name, Surname, place/date of birth, nationality, address, title, organisational unit, name of organisation represented, office/mobile phone numbers, fax number, e-mail address (functional e-mail address of organisation recommended), identity document type/number, place/date of document issue, gender (needed for the right title), eventual banking information of invited experts or participants' organisation. If needed, evaluation criteria or CV might be requested to manage events with limited or restricted available places. Minutes, reports, powerpoint presentations or relevant documentation used during meetings can be collected and shared with meeting participants.

**Information about the accommodation:** (hotel name and address) and flight (flight reference, company, destination,time of departure/arrival) of the participants may be collected in order to organise the transportation/reimbursement of the participants.

Photographs/pictures of groups of participants and organizers could be taken and published in the context of the event and in the framework of the European Labour Authority activities.

Also live web streaming and/or audio and video recording of speakers and participants can be registered and published and/or shared in the framework of the European Labour Authority activities.

In case of external events, the payment of fees can be requested (e.g. accommodation, party,...). In case of invitation of experts, an eventual reimbursement can be provided.

In case of events with minors, an authorisation form signed by parent/guardian/carer will be collected with the following information: student's name, birthdate and birthplace of the minor and signature of the parent, guardian, carer together with the date and place of the signature.

Information related to the cookies used will be specified in the Privacy Statement.

In some cases, third party IT tools, including Social Media (to be specified in the Privacy Statement by the organiser).

**A separate and explicit consent will be required to collect the following personal data:**

- Dietary requirements and/or access requirements,
- The sharing of the participants list containing name and affiliation with other participants,
- The sharing of the attendee list containing name and affiliation among participants, in order to create working groups to continue the collaborate work launched during the meeting/event,

The processing of your personal data for inviting you to future events the data controller may organise or for managing your subscription to a newsletter of the data controller. This specific case will be covered by Record "DPR-ELA-2022- 0024: Contact lists & network partners databases at the European Labour Authority".

Opt-out option available: before registering for the event, the data subject has the possibility to opt out to having the photograph and audiovisual footage recorded.

For digital events, the data protection records for the relevant tools and platforms apply.

**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.

Description:

Sensitive personal data relating to dietary requirements, accessibility can be collected in order to organise the meetings/visit with a specific mention in the Privacy Statement.

**If applicable, indicate the reasons under article 10(2) allowing the processing of the special categories of data:**

- (a)  The data subject has given explicit consent to the processing of those personal data for one or more specified purposes, [...].
- (b)  Processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security[...].
- (c)  Processing is necessary to protect the vital interests of the data subject or of another person where the data subject is physically or legally incapable of giving consent.
- (d)  Processing is carried out in the course of its legitimate activities with appropriate safeguards by a non-profit-seeking body which constitutes an entity integrated in a Union institution or body and with a political, philosophical, religious or trade-union aim [...].
- (e)  Processing relates to personal data which are manifestly made public by the data subject.
- (f)  Processing is necessary for the establishment, exercise or defense of legal claims or whenever the Court of Justice of the European Union is acting in its judicial capacity.
- (g)  Processing is necessary for reasons of substantial public interest, [...]
- (h)  Processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services [...].
- (i)  Processing is necessary for reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health or ensuring high standards of quality and safety of health care and of medicinal products or medical devices [...].
- (j)  Processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes [...].

#### Additional information

##### 1.3.2.2 Data related to 'criminal convictions and offences'

<b>The data being processed contain sensitive data which fall(s) under Article 11 'criminal convictions and offences'</b>	<b>N/A</b> <input checked="" type="checkbox"/> <b>Yes</b> <input type="checkbox"/>
---	---

#### 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 for an event	6 months after the last action linked to the event is performed	Collection of the data	
Photographs and audiovisual material	Will be kept only for the time needed to achieve the purpose for which it is processed. Collected photographs and audiovisual material are stored as long as follow-up actions are needed in the context of the event concerned. All photographs and audiovisual	Collection of the data	

	<p>material will be deleted 10 years after the last action concerning the event is performed.</p> <p>For some specific events, photographs and audio visual material will be deleted within 2 years from the collection of the data.</p> <p>Please check the specific Privacy Statement of the event.</p>		
Registration	6 months after the last action linked to the event is performed		
Recordings from web-streamed or digital meetings or events	<p>Recordings will be kept only for the time needed to achieve the purpose for which it is processed and will be stored as long as follow-up actions are needed in the context of the event concerned.</p> <p>All recordings will be deleted 10 years after the last action concerning the event.</p> <p>For some specific events, recordings will be deleted within 5 years from the collection of the data.</p> <p>Please check the specific Privacy Statement of the event</p>		
Sensitive personal data relating to dietary requirements, accessibility, etc.	1 month after the after last action where the data is needed is completed.		
Personal data collected to issue badges in order for the data subjects to gain access to European Labour Authority premises	6 months after last action linked to the event is performed		
Personal data collected for future mailing purposes linked to the meeting/event	Until the subscriber unsubscribes from the mailing list.		

**Description**

In general, personal data related to an event will be deleted 6 months after the last action related to the specific event is taken.

Reports containing personal data will be archived according to the ELA filing plan and specific retention list for a period of 5 years (see ELA 7. Communication management, 7.2.1 Organisation of events and 7.2.2 Participation on external events with the exception of ELA 7.2.3 Visits to ELA where personal data could be retained for a maximum of 10 years time).

Nevertheless, if agree by the data subject, personal data linked to the user account created during the first registration will be part of a list of contact details shared internally among the European Labour

Authority services for the purpose of contacting data subjects in the future in the context of the European Labour Authority's activities.

This process will be covered by the "Record DPR-ELA-0024 - Contact lists & network partners databases at the European Labour Authority".

If data subjects do not agree with this or do not wish to be part of the list of contacts anymore, they may contact the Controller by using the Contact Information as mentioned in the specific Privacy statement drafted for a specific event. As soon as the Controller reads the e-mail message from the data subject asking for changing/blocking/erasing personal data and at the latest 15 working days after the reception of the e-mail the request is answered respectively executed.

Personal data which are to be stored for historical, statistical or scientific use should be kept only in anonymous form.

## 1.5 RECIPIENTS

Origin of the recipients of the data	
1. <input checked="" type="checkbox"/> Within the EU organization	<p>Officials and other staff of the European Labour Authority responsible for the data processing and the e-service system administrators.</p> <p>Personal data may be communicated to other ELA services assisting in fulfilling the objective for which the data is managed.</p>
2. <input checked="" type="checkbox"/> Outside the EU organization	<p>Other EU institution and bodies staff in specific cases.</p> <p>External contractors, where applicable.</p> <p>Some of the personal data could be printed or published on the Internet (publicly available) or transmitted to other third country, therefore an opt-in option will be available.</p>

Categories of the data recipients
<p>1. <input checked="" type="checkbox"/> A natural or legal person</p> <p>2. <input type="checkbox"/> Public authority</p> <p>3. <input type="checkbox"/> Agency</p> <p>4. <input type="checkbox"/> Any other third party, specify</p> <p>Specify who has access to which parts of the data:            ELA staff organising the event has access to all data and distribute with necessary internal services, e.g. for access control, reimbursement of costs.            External contractors            Other EU Institutions and bodies            General public.</p>

### Description

Participants of the "event" and a wider public could be provided that minutes/reports/notices/proceedings/photographs and pictures of groups of participants and organizers are published on internet.



In case of an event organised by both the European Labour Authority and an external company, the external contractor will act as processor and will have access to personal data too. In these cases, external contractors are bound by 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 ('GDPR' - Regulation (EU) 2016/679).

In some cases, personal data could be shared with other European Institutions and bodies, also bound by Regulation(EU) 2018/1725. A specific clause in the Privacy Statement of the event will cover it.

In case of in-house events, the Security Service/Recepcionist receives a list of participants for access control and entrance permission purposes .

## 1.6 INTERNATIONAL DATA TRANSFERS

<b>Transfer to third countries or international organisations of personal data</b>	
<b>1. Transfer outside of the EU or EEA</b>	
<input type="checkbox"/> N/A, transfers do not occur and are not planned to occur <input checked="" type="checkbox"/> YES,	
Country(ies) to which the data is transferred	
<b>2. Transfer to international organisation(s)</b>	
<input checked="" type="checkbox"/> N/A, transfers do not occur and are not planned to occur <input type="checkbox"/> Yes, specify further details about the transfer below	
Names of the international organisations to which the data is transferred	
<b>3. Legal base for the data transfer</b>	
<input checked="" type="checkbox"/> Transfer on the basis of the European Commission's <b>adequacy decision</b> ( <i>Article 47</i> ) <input checked="" type="checkbox"/> Transfer subject to <b>appropriate safeguards</b> ( <i>Article 48.2 and .3</i> ), specify:	
2. (a) <input type="checkbox"/> A legally binding and enforceable instrument between public authorities or bodies. Standard data protection clauses, adopted by (b) <input type="checkbox"/> the Commission, or (c) <input type="checkbox"/> the European Data Protection Supervisor and approved by the Commission, pursuant to the examination procedure referred to in Article 96(2) . (d) <input type="checkbox"/> Binding corporate rules, <input type="checkbox"/> Codes of conduct , <input type="checkbox"/> Certification mechanism pursuant to points (b), (e) and (f) of Article 46(2) of Regulation (EU) 2016/679, where the processor is not a Union institution or body.	
3. Subject to the authorisation from the European Data Protection Supervisor:	
<input type="checkbox"/> Contractual clauses between the controller or processor and the controller, processor or the recipient of the personal data in the third country or international organisation.	
<input type="checkbox"/> Administrative arrangements between public authorities or bodies which include enforceable and effective data subject rights.	
<input type="checkbox"/> Transfer based on an <b>international agreement</b> ( <i>Article 49</i> ), specify	
<b>4. Derogations for specific situations</b> (Article 50.1 (a) –(g))	

N /A

Yes, derogation(s) for specific situations in accordance with article 50.1 (a) –(g) apply (ies).

In the absence of an adequacy decision , or of appropriate safeguards, transfer of personal data to a third country or an international organisation is based on the following condition(s):

- (a)  The data subject has explicitly consented to the proposed transfer, after having been informed of the possible risks of such transfers for the data subject due to the absence of an adequacy decision and appropriate safeguards
- (b)  The transfer is necessary for the performance of a contract between the data subject and the controller or the implementation of pre-contractual measures taken at the data subject's request
- (c)  The transfer is necessary for the conclusion or performance of a contract concluded in the interest of the data subject between the controller and another natural or legal person
- (d)  The transfer is necessary for important reasons of public interest
- (e)  The transfer is necessary for the establishment, exercise or defense of legal claims
- (f)  The transfer is necessary in order to protect the vital interests of the data subject or of other persons, where the data subject is physically or legally incapable of giving consent
- (g)  The transfer is made from a register which, according to Union law, is intended to provide information to the public and which is open to consultation either by the public in general or by any person who can demonstrate a legitimate interest, but only to the extent that the conditions laid down in Union law for consultation are fulfilled in the particular case

#### Description

The European Labour Authority may send personal data to a participant residing in any country outside the EU. Apart from the participants's own personal data, the European Labour Authority only discloses personal data to a participant residing outside the EU if the conditions for a transfer of personal data to a third country or an international organisation under Chapter V of Regulation (EU) 2018/1725 are met.

Since the factual and legal circumstances, including the place of residence of the applicant, are different for each participant and event, the existence of a legal base for the transfer (Article 47 of Regulation (EU) 2018/1725 or the application of a derogation for a specific situation (Articles 50(1)(d) and (g) of Regulation (EU) 2018/1725) have to be assessed case-by-case by the European Labour Authority.

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

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

### 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 Public register of records on personal data )

Other form of publication, specify

Privacy Statement will be attached to the invitation of the specific event.

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 on ELA main website

#### Description:

On the basis of a justified question by the data subject to the Controller by means of a functional mail box ( @ela.europa.eu), the requested personal data change will be implemented within 15 working days.

A "generic" Service Specific Privacy Statement has to be adapted by the event Co-ordinator and Processor by selecting the options linked to the management of the "event":

- Event organised by the ELA - inside ELA premises
  - Event organised by the ELA - outside ELA premises
- 

- Event organised by both the ELA and an external company - inside ELA premises
  - Event organised by both the ELA and an external company - outside ELA premises
- 

- Personal data are published on a publicly available website,
  - Personal data are NOT published on a publicly available website
- 

- A report including a presence list is shared between participants and organisations
- A presence list is NOT shared between participants and organisations.

When the person registers by phone (which is exceptional because most people register on-line), the ELA will send them (via post) a letter of confirmation plus a copy of the privacy statement. Thus, the privacy statement is given to them before the event. As well as that, they receive contact details for the controller, whom they can contact if they want to exert their rights.

For digital events, the privacy statements of the platforms and tools used to organise and manage the event, apply.

### 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.