European Labour Authority

DATA PROTECTION OFFICER

RECORD OF PROCESSING OPERATIONS ON PERSONAL DATA

DPR-ELA-2022-0053 EURES internal communication ticketing system - JIRA

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

1.1   GENERAL INFORMATION

Record reference	DPR-ELA-2022-0053
Title of the processing operation	EURES internal communication ticketing system - JIRA
Controller entity	European Labour Authority, Information and EURES 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 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. The support and operations of EURES Portal is performed with the support of: In relation to the EURES HELPDESK, the external contractor below provides assistance to the ECO Team in the ELA: CRI (LUXEMBOURG) SA 11 Rue de l'Industrie L-8399 Windhof (Wandhaff) The European Labour Authority Staff is provided with Microsoft 365 services, therefore: 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

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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.*

Corporate Record	☐ Yes ☒ No
Language of the record	English
Record Model	☒ N/A

1.2   PURPOSE AND DESCRIPTION OF THE PROCESSING

1.2.1   Purpose

EURES is a European cooperation network of employment services. It covers all European Union countries as well as Iceland, Liechtenstein, Norway and Switzerland.

The network is coordinated by the European Coordination Office (ECO), established within the European Labour Authority (ELA). ECO manages the EURES portal and has developed several applications inside the EURES portal to support the interoperability processes inside the Portal among the different actors.

In particular, JIRA works as a ticketing system to communicate between the ECO, the EURES IT Team in the European Commission and the National Coordination Offices (NCO) in the Member States through its different projects.

For this purpose and in order to effectively manage EURES Portal and ensure a secure channel of communication among the different actors involved the process of personal data is needed.

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

    Ticketing system where consultations are encoded and attributed to one team/person. Follow up of the consultation is also encoded in the system.

2.   ☒ Manual processing

    a. ☐ Word documents

    b. ☒ Excel sheet

    c. ☐ Any other, specify

3.   ☒ Any other mode, specify

    External contractor report monthly to the ECO team in the ELA. Specific procedure documented and technical documentation revised yearly (Project Quality Plan).

Description

Process described in detail in the Interoperability manual. Specific training and tutorial are provided to the JIRA users.

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:

The JIRA platform is under a Portal facilitated by the European Commission, but the management and development are performed by the European Labour Authority, ECO.

The data is stored in a database located in the Data Centre of the European Commission and access to this data is protected by an authentication mechanism. Access to the service is made available through the EUROPA web servers, also located in the Data Centre, where the portal is hosted.

Security measures are continuously introduced whenever there is a need for it. All interactions with the portal involving personal information, in particular registration and log in to the EURES accounts, is submitted via secure HTTPS connections.

1.2.5 Comments on the processing of the data

1.3 DATA SUBJECTS AND DATA CATEGORIES

1.3.1 Data subjects' categories

1.	Internal to organisation	JIRA administrators and users within the Information and EURES Unit in the European Labour Authority
2.	External to organisation	External contractor staff assigned to the specific project EURES EURES IT Team in the European Commission JIRA users in the NCOs

1.3.2 Data categories/fields

Indicate the categories of data that will be processed

1. **Profile page:**
   Mandatory information: Username, full name, password, email.
   Non-mandatory information: groups, picture, labels.

2. **Related project:** EURES Portal Management or EURES Helpdesk with the respective names of the Project leaders.
   EURES Portal Management relates to technical support for the EURES Portal
   EURES Helpdesk relates to specific business support.

3. **Ticket information:**
   Status, description of the incident/issue, person attributed, follow-up (comments), priority, dates.

4. **Logs**

5. **Personal data related to a specific CV/profile of a jobseeker or an employer**

6. **Abuse case**
   In relation to the specific process of misuse/abuse of the data in the EURES Portal, the relevant Privacy Statement will 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.

☒ **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
Profile page related date	As long as the user has access to the platform due to their professional/legal obligations.
Personal data related to the ticket including personal data from jobseekers/data employers	1 year after the consultation is closed and solved the data will be aggregated and the ticket will relate only to the specific organisation without any personal data references.
Personal data related to misuse/abuse of data on the EURES Portal	The type of abuse/misuse and record of the action taken will be kept for as long as the measure foresees, following the specific procedure fort these cases.
Logs	Stored for a maximum of 6 months. In context of investigations of security incidents the data could be further processed following record 'DPR-ELA-2022-0032 Security investigations' where a different retention period applies.

1.5   RECIPIENTS

Origin of the recipients of the data	
1. ☒ Within the EU organization	JIRA administrators and users within the Information and EURES Unit

2. ☒ Outside the EU organization	External contractor staff assigned to the specific project EURES EURES IT Team in the European Commission JIRA Users designated by the NCO

Categories of the data recipients
1.   ☒ A natural or legal person 2.   ☒ Public authority 3.   ☐ Agency 4.   ☐ Any other third party, specify

Description

Administrators of the platform:
In the Information and EURES Unit (ECO), in the external contractor and IT EURES Team in the European Commission will have access to all data categories in order to assigned the consultation to the appropriate service/person.
Users of the platform:
The platform is divided in two different projects and users are attributed to one or another and will only have access to their specific one. Only relevant tickets will be shared with the concerned NCO.
FAQ documents could be created on the basis of the consultations received through JIRA but will not include personal data.

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,	
Country(ies) to which the data is transferred	Iceland, Liechtenstein, Norway (EEA)and Switzerland
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	
Names of the international organisations to which the data is transferred	

3. Legal base for the data transfer
 	
☒ Transfer on the basis of the European Commission's **adequacy decision** *(Article 47)*
 	
☐ Transfer subject to **appropriate safeguards** *(Article 48.2 and .3),* specify:
 	
    2. (a) ☐ A legally binding and enforceable instrument between public authorities or bodies.
 	
        Standard data protection clauses, adopted by
        (b) ☐ the Commission, or	

(c) ☐ the European Data Protection Supervisor and approved by the Commission, pursuant to the examination procedure referred to in Article 96(2) .

(d) ☐ Binding corporate rules, ☐ Codes of conduct , ☐ 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:

☐ 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.

☐ Administrative arrangements between public authorities or bodies which include enforceable and effective data subject rights.

☐ Transfer based on an i**nternational agreement** *(Article 49),* specify

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4. Derogations for specific situations (Article 50.1 (a) –(g))

☒ N /A

Description

On the basis of Article 45 of Regulation (EU) 2016/679, the European Commission, has determined that Switzerland has an adequate level of protection , therefore no further safeguard is needed.[1]

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
PS will be attached to the JIRA Platform.

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[1] 2000/518/EC: Commission Decision of 26 July 2000 pursuant to Directive 95/46/EC of the European Parliament and of the Council on the adequate protection of personal data provided in Switzerland

☒ 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:
Specific trainings provided under the EURES Extranet.
Specific FMB available in case of any particular issue: **EMPL-EURES-INTEROP@ec.europa.eu**

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.