



**European Labour Authority**

DATA PROTECTION OFFICER

**RECORD OF PROCESSING OPERATIONS ON PERSONAL DATA**

DPR-ELA-2023-0029 Organisation and management of mandatory trainings on health and safety for  
ELA Staff

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

**1.1 GENERAL INFORMATION**

<b>Record reference</b>	DPR-ELA-2023-0029
<b>Title of the processing operation</b>	Organisation and management of mandatory trainings on health and safety for ELA Staff
<b>Controller entity</b>	The European Labour Authority, Resources Unit
<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 BOZPO AGENCY s.r.o. Bernolákova 2082/17 955 01 Topoľčany Slovakia
<b>Data Protection Officer Name and contact details</b>	Laura NUNEZ BAREZ European Labour Authority Landererova 12, 811 09 Bratislava I Slovakia Email: data-protection@ela.europa.eu
<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) is committed to maintain a safe and healthy working environment. Therefore, ELA needs to establish its Health and Safety at work place in accordance with the relevant Slovak legislation, requiring each employee of the organisation to undertaking on-line training on Safety at workplace once in 2 years and on-line training on Fire prevention every 3 years.

In addition, ELA shall provide a basic on-line First Aid training for each interested employee and established a specific group of First Aiders and Evacuation Stewards among its Staff Members.

To perform these activities, the ELA Resources unit will need to collect and process personal data. The main purpose of the processing of personal data is the management and administration of the specific training programme above mentioned, provide certification and follow up on the continuity of the training over the years.

### 1.2.2 Processing for further purposes

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

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
 

Other M365 tools available to better organize the work related to this process.
3.  Any other mode, specify

### 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

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

Each staff member will receive a certification after the completion of the relevant courses.

**1.3 DATA SUBJECTS AND DATA CATEGORIES**

**1.3.1 Data subjects' categories**

1. Internal to organisation	ELA Staff
2. External to organisation	Contact person(s) and trainer from the company entitled to provide education and training

**1.3.2 Data categories/fields**

ELA Staff

Name, surname and email address, licences, certificates or documents containing the registration number, date of birth of the person to whom the licence/certificate/ document was issued, the date of completion of the final examination, the date of issue and the activity, specifying the scope.

External contractor:

Name, surname, email address and company as contact point(s) to organise the training.

**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

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
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All data categories	5 years
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**Description**

According to the ELA filing plan and specific retention list: ELA.6.5.3 Human resources management > Performance and career development > Staff learning and development the files related to staff learning and development (training plans, appraisal reports, etc.) can be kept for **5 years**.

In addition, national legislation requires that in order to ensure safety and health at work, the employer shall keep and keep the prescribed documentation, records and records relating to safety and health at work for **5 years** from the date on which the last entry was made, unless otherwise provided for in specific legislation.

**1.5 RECIPIENTS**

Origin of the recipients of the data	
1. <input checked="" type="checkbox"/> Within the EU organization	ELA HR Sector Relevant staff in Resources Unit on a need to know basis
2. <input checked="" type="checkbox"/> Outside the EU organization	External company entitled to provide education and training

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

**Description**

ELA HR Sector will have access to all data categories and the Head of Resources Unit and staff in Resources Unit on a need to know basis.

The staff form the external company entitled to provide education and training on a need to know basis.

**1.6 INTERNATIONAL DATA TRANSFERS**

Transfer to third countries or international organisations of personal data
<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>
<p><b>3. Derogations for specific situations (Article 50.1 (a) –(g))</b></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**

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

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:

Two Privacy Statements are linked to this Record:

- Privacy Statement for training on health and safety (legal obligation)
- Privacy Statement for training on First-Aid (consent)

Guidance on data subjects’ rights at [ELA main website](#).

**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.