



European Labour Authority

DATA PROTECTION OFFICER

RECORD OF PROCESSING OPERATIONS ON PERSONAL DATA

DPR-ELA-2022-0039 ELA parking spaces management

1 PART 1: PUBLIC - RECORD (ARTICLE 31¹)**1.1 GENERAL INFORMATION**

Record reference	DPR-ELA-2022-0039
Title of the processing operation	ELA parking spaces management
Controller entity	European Labour Authority, Resources 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
External organisation(s)/entity(ies) Names and contact details	<input type="checkbox"/> N/A <input checked="" type="checkbox"/> YES Owner of the building: J&T REAL ESTATE, a.s. Dvořákovo nábrežie 10 811 02 Bratislava, Slovakia. Buidling Management: Danube Facility Services, s.r.o. Dvorakovo nabrezie 10 811 02 Bratislava, Slovakia. External Security services of the building Receptionist/Information clerk of the building 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 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

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**

This process of personal data aims to ensure the management of parking spaces in ELA's premises (Landererova 12, Bratislava, Slovakia) and /or Tower 115 compound where the European Labour Authority (ELA) is responsible for its use via a specific agreement.

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
3. Any other mode, specify

Description

ELA Resources Head of Unit will have access to the data and will evaluate if the colleague requesting access to the parking space is entitled to have such access as indicated in the procedure described in the Standard Operating Procedure on ELA parking policy (attached below).

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

This process of personal data is related to the process described in Record "DPR-ELA-2022- 0008 ELA access control, CCTV system and parking cards", available in [ELA Public Register](#).

For parking purposes, plate recognition (vehicle identification registration) is in place, in case data subjects voluntary agree to share the vehicle/car plate number with the Building Management for programming the parking access system.

The processing of personal data is aligned with the Rules and Regulation of the Landererova, 12. For this purpose, the building also means any of its parts or components, shared premises and facilities,

equipment, parking areas around the building, entrance gates, adjacent lands and adjacent roads in the surroundings of the building which are owned by the owner of the building and which are intended to be used along with the building.

1.3 DATA SUBJECTS AND DATA CATEGORIES

1.3.1 Data subjects' categories

1. Internal to organisation	ELA Staff applying for a parking space
2. External to organisation	Visitors

1.3.2 Data categories/fields

ELA Staff:

Name, Surname, vehicle/car plate number and category applying for:

- Executive Director/Head of Unit
- Personal need: self-declaration
 - Reduced mobility
 - Social/medical condition (e.g. person taking care as a single parent for a child under the age of 14 and/or a member with disability in his/her household, pregnant)
- Carpooling/car sharing: declaration of intention mentioning the name and surname of colleague(s) with whom will be travelling, date and signature
- Years of service: initial date of contract
- Interest of service

Comments/Additional information

Visitors:

Name and surname, vehicle/car plate number, dates and duration of the visit, receiving ELA Staff member.

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:

Self-declaration on reduced mobility and/or social/medical condition. By default, no further documentation will be requested. Only in case of a conflict, ELA HR Team might verified proof of this special situation.

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 [...].

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"/>
Description:	

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
All data categories	As long as the staff uses the parking space.	The processing starts with the application of the person, before the assignation of the parking space	3 months after the assignation/non assignation of the space. A three month policy will be implemented in order to set a fair assignation of the parking space.

1.5 RECIPIENTS

Origin of the recipients of the data	
1. <input checked="" type="checkbox"/> Within the EU organization	ELA HR Team ICT and Facilities Team Line manager

	Head of HR Sector
2. <input checked="" type="checkbox"/> Outside the EU organization	Owner of the building Building manager

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

ICT and Facilities Team is responsible for implementing the policy, processing applications and assigning the parking places to ELA Staff.

Line Manager is responsible for validating requests for parking in case of personal need.

Head of HR Sector is responsible for validating the request for personal need and years of service.

Owner of the building and building management will only receive the vehicle/car plate number.

1.6 INTERNATIONAL DATA TRANSFERS

Transfer to third countries or international organisations of personal data	
1. Transfer outside of the EU or EEA	
<input checked="" type="checkbox"/> N/A, transfers do not occur and are not planned to occur	
<input type="checkbox"/> YES,	
Country(ies) to which the data is transferred	
2. Transfer to international organisation(s)	
<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	
3. Legal base for the data transfer	
<input type="checkbox"/> Transfer on the basis of the European Commission's adequacy decision (Article 47)	
<input type="checkbox"/> Transfer subject to appropriate safeguards (Article 48.2 and .3), 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.	

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

Transfer based on an **international agreement** (Article 49), specify

4. 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).
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

1.7 INFORMATION TO DATA SUBJECTS ON THEIR RIGHTS

Rights of the data subjects
<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: SharePoint on ELA Data Protection)
- External website (URL: <https://www.ela.europa.eu/en/privacy-policy>)

Other form of publication, specify

Privacy Statement will be published together with the parking policy and announced to all ELA staff.

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 is available in ELA's 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.