



**European Labour Authority**

DATA PROTECTION OFFICER

**RECORD OF PROCESSING OPERATIONS ON PERSONAL DATA**

DPR-ELA-2023-0003 ELA interactive online training platform

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

**1.1 GENERAL INFORMATION**

<b>Record reference</b>	DPR-ELA-2023-0003
<b>Title of the processing operation</b>	ELA interactive online training platform
<b>Controller entity</b>	European Labour Authority, Cooperation Support 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 organization(s)/entity(ies) Names and contact details</b>	<input checked="" type="checkbox"/> N/A <input type="checkbox"/> YES
<b>External organization(s)/entity(ies) Names and contact details</b>	<input type="checkbox"/> N/A <input checked="" type="checkbox"/> YES  eDaktik Moeringgasse 20/5A 1150 Wien Austria
<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

<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) through its Cooperation Support Unit aims to provide specialized training on the main areas of the Authority (e.g. mediation, Concerted and Joint cross-border Inspections, undeclared work or cross border mobility rules among others) to public officers in national authorities of the EU Member States (MS).

In this particular case, ELA and MS employees will have access to a software-based learning management system, provided by an external contractor. The system does not require the direct link to personal data, but to data to:

- Grant access to the specific platform
- Provide training material and e-learning

### 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 minimization

- Pseudonymization
- 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

Link to an external training platform provided by the external contractor.

- a.  Excel sheet
  - b.  Any other, specify
2.  Any other mode, specify

Online training platform supported by SCORM packages.

### 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**

Online (interactive) training platform:

The external contractor will receive the names of the candidates, but not their CVs. This contractor will also receive the email address of each of the current registered participants in order to send them a login and a password that enables access. At this stage, users will receive the link to ELA web site with the privacy statement for accessing.

Regarding specific training: The tenderer will provide the link to ELA, and ELA will send it to the member states enforcement authorities, and these will designate the trainees that will have access to the online interactive training platform.

**1.3 DATA SUBJECTS AND DATA CATEGORIES**

**1.3.1 Data subjects' categories**

1. Internal to	ELA staff
2. External to	Officials from national authorities Special advisers nominated by the Member States

**1.3.2 Data categories/fields**

Indicate the categories of data that will be processed:

**For the online/hybrid training:**

Name, surname, organization, role/position, email address and country.

Their activity in the course will be monitored and a certification of attendance will be provided after its completion.

Anonymous surveys can be organised to understand the relevance of the course, relevant topics for future training sessions or the satisfaction of the participants.

**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 <input checked="" type="checkbox"/> Yes <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
Data categories related to the participants	Will be kept for maximum <b>one year</b> after the specific training take place. After this year only aggregated data will be kept.

**1.5 RECIPIENTS**

Origin of the recipients of the data	
1. <input checked="" type="checkbox"/> Within the EU organization	ELA Staff
2. <input checked="" type="checkbox"/> Outside the EU organization	Staff of the external contractor Line managers of the external applicants

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 staff of the organising Unit** will have access to the participants data on an “*a need-to-know basis*”.

**Line managers** will have access to their staff data and the status of the training (completed or not) .

**External contractors** will have access to the list of participants and their email in order to grant access to their training platform.

**1.6 INTERNATIONAL DATA TRANSFERS**

Transfer to third countries or international organizations 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 organization(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>

**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 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

External providers’ website.

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:**

Guidance on data subjects’ rights available on 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 organizational measures. Technical measures include appropriate actions to address online security, risk of data loss, alteration of data or unauthorized access, taking into consideration the risk presented by the processing and the nature of the personal data being processed. Organizational measures include restricting access to the personal data solely to authorized persons with a legitimate need to know for the purposes of this processing operation.