



**European Labour Authority**

DATA PROTECTION OFFICER

**RECORD OF PROCESSING OPERATIONS ON PERSONAL DATA**

**DPR-ELA-2024-0020 EURES targeted consultation activities (including surveys, interviews and focus groups)**

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

**1.1 GENERAL INFORMATION**

<b>Record reference</b>	DPR-ELA-2024-0020
<b>Title of the processing operation</b>	EURES targeted consultation activities (including surveys, interviews and focus groups)
<b>Controller entity</b>	European Labour Authority, Information and EURES 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  <b>Ecorys Europe EEIG - GEIE</b> Rue Belliard 12, 1040 Brussels, Belgium  <b>UAB PPMI Group (PPMI)</b> Gedimino pr. 50, LT-01110 Vilnius, Lithuania
<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>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

The European Labour Authority, Information and EURES Unit aims to perform targeted consultations to obtain the views of the respondents (e.g. stakeholders, individuals) on a specific initiative, policy or intervention related to Information and EURES activities.

A targeted consultation activity addresses specific, well-defined stakeholder groups and invites them to participate. It can be **online, via e-mail and in writing but also oral through interviews and meetings** (for example, a focus group, workshop or conference). The processing of personal data is therefore necessary to carry out a targeted consultation.

In the majority of the cases, the Authority will not be interested in the identity of the stakeholder or respondent. It is the responsibility of the respondents who opted for confidentiality of their personal data to avoid any reference in the submissions that would reveal their identity.

In limited cases, personal data may be requested. In this case, a **explicit consent** from the stakeholder or respondent will be required. This will need to be identified in the specific privacy statement covering the specific targeted consultation.

Similarly, photographs and audio- or video recordings are only taken and/or published based on the **explicit consent** of the data subject.

Certain targeted consultations may use the Commission's online questionnaire tool EUSurvey which requires login via EULogin. EULogin requires certain personal data such as name, surname and e-mail address of the registrant. For further information on EULogin and EUSurvey please refer to the dedicated processing operations 'Identity & Access Management Service (IAMS)' (reference number in the public DPO register: [DPR-EC-08606](#) (internal users) and [DPR-EC-27608](#) (external users)) and 'EUSurvey' (reference number: [DPR-EC-01488](#)).

The controller must ensure that the processing of the contact details of the prospective respondents is lawful and may, for example, be covered by one of the following scenarios:

- The contact details of the prospective respondent are already in the possession of/processed by the controller/processor since the prospective respondent subscribed to, and thus gave his/her consent to, be part of a mailing list to be informed of/contacted in case of future consultations by the European Labour Authority;
- The contact details of the prospective respondent are already in the possession of/processed by the controller/processor since the European Labour Authority processed your personal data in the context of another processing operation and the further processing of the contact details for this targeted consultation activity is processing for another compatible purpose in accordance with Article 6 of Regulation (EU) 2018/1725;
- The contact details of the prospective respondent have not been in the possession of the European Labour Authority / the processor and have been solely collected for the purpose of this targeted consultation. The contact details have been collected from the internet where they have been manifestly made public by the prospective respondent or the organisation he/she works for. The prospective respondent has been identified by the controller / the processor as a stakeholder whose views are relevant and necessary to achieve the specific purpose of the targeted consultation in the public interest as described above.

**The participation in the targeted consultation activity is completely voluntary.**

### 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  
Power-Point presentations, pdf-documents, e-mails.
3.  Any other mode, specify  
Photographs, audio or videorecording of data subjects, if applicable.

**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:**

In case data are stored on a contractor’s server (if an external company acts as a processor), contractors are bound by a specific contractual clause for any processing operations carried out on behalf of the European Labour Authority, and by the confidentiality obligations deriving from the General Data Protection Regulation.

**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	Every individual who is subject to/responds to a targeted consultation.
2. External to organisation	Every individual who is subject to/responds to a targeted consultation.

**1.3.2 Data categories/fields**

Only personal data necessary for participation in the targeted consultation will be collected and processed. The personal data varies from one targeted consultation to another. The specific privacy statement will provide the necessary categories of personal data and the reasons for them.

Categories of personal data most frequently processed are:

- **Identification data:** name and surname, name of the competent authority, profession, country and contact details (telephone, e-mail).
- **Contacts of other stakeholders.**
- **Interview data:** Experiences, best practices and opinions about a specific situation, aim of the interview and date. Personal data related to the physical, economic, cultural, or social identity of the respondent, insofar as they are not falling under Article 10 of the Regulation.
- **Audio-video recordings of the interviews** can be performed to ensure the verbatim record of what was said during the interview.
- **Survey data:** Experiences, best practices and opinions about a specific situation.

Furthermore, respondents may spontaneously provide other, non-requested personal data in the context of their reply to a targeted consultation.

**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'**

<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	
Identification data	2 years	<i>From the start of the study/targeted consultation</i>
Interview data	1 year	<i>From the end of the study/targeted consultation</i>
Audiovideo recordings	6 months	<i>From the end of the study/targeted consultation</i>

**1.5 RECIPIENTS**

<b>Origin of the recipients of the data</b>	
1. <input checked="" type="checkbox"/> Within the EU organization	Recipients of personal data are staff authorised by the organisational entity in charge of the targeted consultation to process replies and contributions related to a targeted consultation.
2. <input checked="" type="checkbox"/> Outside the EU organization	Any external service provider processing personal data on behalf of the operational controller and any subcontractor, if applicable.

<b>Categories of the data recipients</b>
1. <input type="checkbox"/> A natural or legal person 2. <input checked="" type="checkbox"/> Public authority 3. <input type="checkbox"/> Agency 4. <input checked="" type="checkbox"/> Any other third party, specify  Specify who has access to which parts of the data: Any external service provider processing personal data on behalf of the operational controller, and any sub-contractor, if applicable.

**Description**

Certain personal data may be made public on the European Labour Authority website. A explicit consent will be requested from the data subjects.

**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 checked="" type="checkbox"/> N/A, transfers do not occur and are not planned to occur <input type="checkbox"/> YES,
<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
<b>3. Derogations for specific situations (Article 50.1 (a) –(g))</b> <input checked="" type="checkbox"/> N /A <input type="checkbox"/> Yes, derogation(s) for specific situations in accordance with article 50.1 (a) –(g) apply (ies).

**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: Sharepoint on Personal data protection )
- External website  (URL: <https://www.ela.europa.eu/en/privacy-policy> )

Other form of publication, specify

Specific Privacy statement will be attached for each specific targeted consultation.

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.

Guide on data subjects rights.

**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.