

**[MODEL GENERIC PRIVACY STATEMENT]**

**NB: TEXT IN RED SHALL BE DELETED**

THE TEXT IN RED PROVIDES YOU WITH GUIDANCE ON HOW TO FILL IN THIS TEMPLATE. IT SERVES TO REMIND YOU OF THE LEGAL OBLIGATIONS RELATED TO YOUR ROLE AS DATA CONTROLLER, AS WELL AS TO HELP YOU ADAPT THE STANDARD TEXT SO THAT THE INFORMATION CONTAINED IN THE PRIVACY STATEMENT IS EXTENSIVE AND CORRESPONDS TO THE PARTICULARITIES OF THE RELEVANT PROCESSING OPERATION. AFTER YOU HAVE COMPLETED THE DRAFTING OF THE PRIVACY STATEMENT, YOU SHOULD ERASE THE GUIDANCE TEXT AND MAKE SURE THAT IT DOES NOT APPEAR IN THE FINAL VERSION THAT YOU WILL PROVIDE TO THE DATA SUBJECTS.

As data controller, you are reminded about your obligations in relation to [Regulation \(EU\) 2018/1725 \('the Regulation'\)](#). In particular vis-a-vis the data subjects you need to:

- take appropriate measures to provide any information and any communication to the data subjects in a clear, easily understandable, transparent and concise form, as well as **facilitate for the data subjects to the exercise his or her rights** as indicated in article 14 of the Regulation.
- to **provide the data subjects with all the necessary information** as described in articles 15 and 16 of the Regulation in order to ensure a fair and transparent processing. You must ensure this information is provided to the data subjects at the very beginning of the processing of their personal data.

Therefore, **make the privacy statement available to the data subjects at the outset** when you collect the data directly from them (article 15) or when the data are not collected directly from the data subjects (article 16), you must ensure to communicate it within the time period specified in article 16.3(a)-(c).

It is crucial that you make the privacy statement visible and easily accessible to the data subjects. It should be provided in the most appropriate format and place (e.g. published on the relevant website, provided as part of the online form that the data subjects have to fill in, or in the acknowledgment of receipt when a data subject exercises his/her rights via an email, etc.). You should also ensure that the data subjects are adequately directed towards the privacy statements location in order to become aware of it.

Note also that the information in the privacy statement must be consistent with the relevant sections of the record of the processing operation in the Data Protection Records Register at European Labour Authority. Please verify that the information contained in both documents is the same before submitting the record and privacy statement.

**GENERIC MODEL PRIVACY STATEMENT FOR TARGETED CONSULTATION ACTIVITIES ORGANISED  
BY THE EUROPEAN LABOUR AUTHORITY**

**PROTECTION OF YOUR PERSONAL DATA**

*This is a generic model privacy statement, which can be used for EURES targeted consultation activities (including surveys, interviews and focus groups) of the European Labour Authority. For details on the personal data collected and further processed for the purpose of a specific targeted consultation activity the data subjects should consult the specific privacy statement of that particular consultation activity.*

**This privacy statement provides information about  
the processing and the protection of your personal data.**

**Processing operation: EURES targeted consultation activities (including surveys, interviews and focus groups) -*[Name of the specific consultation activity]***

**Data Controller:** The European Labour Authority, Information and EURES Unit

**Record reference:** DPR-ELA-2024-0020

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## 1. Introduction

The European Labour Authority (hereafter 'ELA') is committed to protect your personal data and to respect your privacy. ELA collects and further processes personal data pursuant to [Regulation \(EU\) 2018/1725](#) of the European Parliament and of the Council of 23 October 2018 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data (repealing Regulation (EC) No 45/2001).

This privacy statement explains the reason for the processing of your personal data, the way we collect, handle and ensure protection of all personal data provided, how that information is used and what rights you have in relation to your personal data. It also specifies the contact details of the responsible Data Controller with whom you may exercise your rights, the Data Protection Officer and the European Data Protection Supervisor.

The information in relation to processing operation '*EURES targeted consultation activities (including surveys, interviews and focus groups)*', in particular: *[Name of the specific consultation activity]*, undertaken by the Information and EURES Unit is presented below.

## 2. Why and how do we process your personal data?

Purpose of the processing operation: The Information and EURES Unit collects and uses your personal information within the framework of targeted consultation activities to obtain your views on a specific initiative, policy or intervention related to EURES portal, such as functionalities or potential uses and applications to improve it.

*[Provide a brief description of the processing operation]*

You are being contacted by the EURES and Information Unit since it has concluded that your views are relevant and necessary to inform the specific initiative, policy or intervention concerned by the targeted consultation.

*The specific privacy statement will explain how the controller/processor got the contact details of the prospective respondent and why the processing of these personal data is lawful. Two possibilities are:*

- *the contact details of the prospective respondent are already in the possession of/processed by the controller/processor and their further processing for the targeted consultation activity is lawful (further explained in the specific privacy statement). We obtained your personal data directly from you, as you have participated in previous events/surveys related to EURES activities and you are part of our contact list covered by Record '[DPR-ELA-2022-0024 ELA Contact lists & network partners databases](#)'. OR*
- *the contact details of the prospective respondent have not been in the possession of the controller/processor and have been solely collected for this targeted consultation activity. The specific privacy statement will explain how they have been collected and why their processing is lawful. We have obtained your personal data from [specify type of source, and if applicable indicate whether it came from publicly accessible sources].]*

The EURES and Information Unit service responsible has decided to: *[Specify the options chosen and delete the ones not used:*

- ***use images, audio/video recordings***  
In the context of the targeted consultation activity, you will be photographed and/or recorded (audio / video). The recording will only be published based on your explicit consent.

- *require respondents to provide personal data in their response given the subject matter of the consultation **OR** only receive pseudonymised data and key for personal data will remain with the contractor and will never be shared with the Authority.*

The subject matter of the consultation activity require you to provide personal data in your response that may identify or make you identifiable. These personal data will only be published subject to your explicit consent **OR** Your personal data will be only processed by our contractor and we will not receive these data from the, For the Authority, replies would be anonymous.

- ***use EUSurvey and/or EULogin***

The consultation activity uses the Commission's online questionnaire tool EUSurvey that requires you to login via your 'EU Login' or 'social media account'. 'EU Login' requires certain personal data such as the name, surname and e-mail address of the registrant. For further information, please refer to the privacy statements of 'EU Login' and 'EU Survey' as well as the processing operations 'Identity & Access Management Service (IAMS)' (reference number in the public DPO register: DPR-EC-03187) and 'EUSurvey' (reference number: DPR-EC-01488). Should you choose to log in through your social media account, please refer to the pertinent social media platform's privacy statement.

- *store personal data in a document management system such as ARES. Your contribution to the targeted consultation is stored in the European Labour Authority's document management system) **OR***

*Your contribution to the targeted consultation is stored in the contractor's servers and never shared with the European Labour Authority. The data will be deleted no later than 1 years of the end of the contract. Aggregated or pseudonymised data might be shared with the European Labour Authority as evidence of the quality research performed*

- *It is your responsibility if you opt for confidentiality of your personal data to avoid any reference in your submission or contribution itself that would reveal your identity.*

Your personal data will not be used for an automated decision-making including profiling.

### **3. On what legal ground(s) do we process your personal data**

We process your personal data, because, according to Article 5(1)(d) you have given consent to the processing of your personal data for one or more specific purposes.

*Further specific legal provisions may be provided in the specific privacy statement.*

### **4. Which personal data do we collect and further process?**

In order to carry out this processing operation the Information and EURES Unit collects the following categories of personal data: *[Specify the categories of personal data concerned.*

- ***Identification data:*** *Name, 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.*
- ***AudioVideo 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.*

Please note that the Data Controller does not request nor expect that data subjects provide any special categories of data under Article 10(1) of Regulation 2018/1725 (that is “personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person’s sex life or sexual orientation”) related to themselves or to third persons in their contributions to the targeted consultation activity. Any spontaneous inclusion of these types of personal data is the responsibility of the data subject and by including any of these types of data the data subject is considered to provide his/her explicit consent to the processing, in accordance with Article 10(2)(a) of Regulation 2018/1725.

The provision of personal data is not mandatory.

#### **5. How long do we keep your personal data?**

The Information and EURES Unit only keeps your personal data for the time necessary to fulfil the purpose of collection or further processing, namely for:

- Identification data: **2 years** from the start of the study/targeted consultation.
- Interview data: **1 year** from the end of the study/targeted consultation.
- AudioVideo recordings: **6 months** from the end of the study/targeted consultation.

#### **6. How do we protect and safeguard your personal data?**

All personal data in electronic format (e-mails, documents, databases, uploaded batches of data, etc.) are stored either on the servers of the European Labour Authority or of its contractors.

ELA’s contractors are bound by a specific contractual clause for any processing operations of your data on behalf of ELA, and by the confidentiality obligations deriving directly from the General Data Protection Regulation in the EU Member States (*‘GDPR’ Regulation (EU) 2016/679.*)

In order to protect your personal data, ELA has put in place a number of technical and organisational measures in place. 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.

#### **7. Who has access to your personal data and to whom is it disclosed?**

Access to your personal data is provided to ELA staff responsible for carrying out this processing operation and to authorised staff according to the “need to know” principle. Such staff abide by statutory, and when required, additional confidentiality agreements.

*Further specific legal provisions may be provided in the specific privacy statement.*

The external contractor staff will have access to specific parts of the personal data on a need to know basis and after the report is done (1 year from the start of the study) will *[Please choose the option that better fits your purpose:*

- *transfer all data to the ELA Information and EURES Unit where staff on a need to know basis will have access to all data categories to work on different studies and from different perspectives* **OR**
- *Delete all personal data related to the concerned study/survey/interview/targeted consultation.*

Any report published by the European Labour Authority will not contain personal data. In the particular case, some personal data (name, surname position and quotes/interviews) will be published a specific consent will be gathered from the person concerned.

*Please note that pursuant to Article 3(13) of the Regulation, public authorities (e.g. Court of Auditors, EU Court of Justice) which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients. The processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing.*

The information we collect will not be given to any third party, except to the extent and for the purpose we may be required to do so by law.

## **8. What are your rights and how can you exercise them?**

You have specific rights as a 'data subject' under Chapter III (Articles 14-25) of Regulation (EU) 2018/1725, in particular the right to access, your personal data and to rectify them in case your personal data are inaccurate or incomplete. Where applicable, you have the right to erase your personal data, to restrict the processing of your personal data, to object to the processing, and the right to data portability.

You have consented to provide your personal data to the Information and EURES Unit for the present processing operation. You can withdraw your consent at any time by notifying the Data Controller. The withdrawal will not affect the lawfulness of the processing carried out before you have withdrawn the consent.

You can exercise your rights by contacting the Data Controller, or in case of conflict the Data Protection Officer. If necessary, you can also address the European Data Protection Supervisor. Their contact information is given under Heading 9 below.

Where you wish to exercise your rights in the context of one or several specific processing operations, please provide their description (i.e. their Record reference(s) as specified under Heading 10 below) in your request.

## **9. Contact information**

### **- The Data Controller**

If you would like to exercise your rights under Regulation (EU) 2018/1725, or if you have comments, questions or concerns, or if you would like to submit a complaint regarding the collection and use of your personal data, please feel free to contact the Data Controller:

*[indicate controller entity, and (ONLY) functional mailbox].*

### **- The Data Protection Officer (DPO) of ELA**

You may contact the Data Protection Officer ([data-protection@ela.europa.eu](mailto:data-protection@ela.europa.eu)) with regard to issues related to the processing of your personal data under Regulation (EU) 2018/1725.

### **- The European Data Protection Supervisor (EDPS)**

You have the right to have recourse (i.e. you can lodge a complaint) to the European Data Protection Supervisor ([edps@edps.europa.eu](mailto:edps@edps.europa.eu)) if you consider that your rights under Regulation (EU) 2018/1725 have been infringed as a result of the processing of your personal data by the Data Controller.

## **10. Where to find more detailed information?**

ELA Data Protection Officer (DPO) publishes the register of all processing operations on personal data by ELA, which have been documented and notified to him. You may access the register via the following link: <https://www.ela.europa.eu/en/privacy-policy>.

This specific processing operation has been included in the DPO's public register with the following Record reference: DPR-ELA-2024-0020 EURES targeted consultation activities (including surveys, interviews and focus groups)