

PROTECTION OF YOUR PERSONAL DATA

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

Processing operation: ELA Wellbeing activities

Data Controller: European Labour Authority, Resources Unit, Human Resources Sector (ELA Human Resources Sector)

Record reference: DPR-ELA-2024-0011

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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 'ELA Wellbeing activities' undertaken by the ELA Human Resources Sector is presented below.

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

Purpose of the processing operation: The ELA Human Resources Sector collects and uses your personal information to protect staff engagement and wellbeing at the workplace. It is important for the authority to cultivate a value-based, inclusive, and environmentally responsible organisation which ensures attractiveness and wellbeing at work and it is promoted through the HR Strategy for 2024.

In particular, the ELA wellbeing journey aims to foster a positive and fulfilling work environment that cultivates employees' commitment, wellbeing, motivation and sense of belonging leading to higher productivity and retention of employees. For this specific purpose, the Human Resources Sector organises several activities focused on wellbeing at work and follow up with specific surveys such as the Wellbeing Pulse Survey to monitor the working conditions, workload and staff engagement.

A specific functional mailbox has been created to deal with specific consultation on this topic from the staff. Only HR staff working in staff engagement & wellbeing on a need to know basis will have access to it.

Some of the initiatives included under the wellbeing journey are:

- Staff activities
- Library
- Wellbeing platform
- Counselling

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.

We do not process **special categories of personal data**, therefore Article 10 of the Regulation does not apply.

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

In order to carry out this processing operation, the ELA Human Resources Sector collects the following categories of personal data:

To organise staff activities

Name, surname, position, Unit, Sector, availability and attendance, phone number/e-mail address.

Surveys

In general, surveys are anonymised. Only the list of contacts is used to send the specific link. In rare occasions, surveys may be pseudonymised, but only the external contractor engaged will have access to the raw data. The Authority will not receive such data, as it is only interested in aggregated data and not particular situations.

Wellbeing platform:

Name, surname, email and courses/ counselling sessions followed.

In the wellbeing platform, it will be also possible for Staff to contact a specialised coach and discuss their personal situation.

The external contractor will also have access to all the activities performed by each user in the platform, including the training history and activity in the platform.

The Authority will not receive any detailed information related to these coaches' session but only credits consumed, and broad topic addressed (e.g. stress, harassment, burnout) to monitor the activity from accounting purposes and understand aggregated areas of concern in the organisation.

® ELA staff can access the portal (for mental well-being or physical well-being) by registering using a private or business email in order to ensure your privacy. In order to register, you need to enter a valid Code, which it will provided to the Authority ahead of time.

The provision of personal data is not mandatory.

5. How long do we keep your personal data?

The ELA Human Resources Sector only keeps your personal data for the time necessary to fulfil the purpose of collection or further processing, namely for:

Staff activities related personal data	The data related to a specific event will be deleted 1 year after the inclusion of the activity in the final report.
Surveys	Most of the surveys are anonymised, in case a survey containing personal data is organised, a specific privacy statement will be prepared. The anonymous surveys are sent to all ELA staff through dedicated groups. These groups are updated at maximum 48-hour intervals.
Wellbeing platform	External contractor will keep the data for 7 years, according to national legislation.

	<p>After the contract ends, the external contractor revoke access to the online platform and delete online user profiles. Record of participation by users are digitally stored for 7 years for legal reasons. These records include the name of the client, the company they worked for, and the sports/nutrition activity (for the physical wellbeing) they participated in. External contractors do not store any sensitive health information on our platform.</p>
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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.

<p>For the wellbeing platform, only aggregated data will be shared with the Authority. No personal information related to the training courses followed or coach sessions followed will be shared with the European Labour Authority.</p>

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 ELA HR Sector 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:

wellbeing@ela.europa.eu

- The Data Protection Officer (DPO) of ELA

You may contact the Data Protection Officer (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) 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-2024-0011 ELA Wellbeing activities.