



European Labour Authority

DATA PROTECTION OFFICER

RECORD OF PROCESSING OPERATIONS ON PERSONAL DATA

DPR-ELA-2022-0013 European Job Days

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

Record reference	DPR-ELA-2022-0013
Title of the processing operation	European Job Days
Controller entity	European Labour Authority, Information and EURES 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
Internal organisation(s)/entity(ies) Names and contact details	<input checked="" type="checkbox"/> N/A <input type="checkbox"/> YES
External organisation(s)/entity(ies) Names and contact details	<input type="checkbox"/> N/A <input checked="" type="checkbox"/> YES Microsoft Ireland South County Business Park, One Microsoft Place, Carmanhall and Leopardstown, Dublin, D18 P521, Ireland <u>For events and Social media:</u> Ecorys Brussels / Ecorys Europe N.V. Rue Belliard 12 1040 Brussels Belgium
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
Record Model	<input checked="" type="checkbox"/> N/A

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

The European (Online) Job Days (EOJD) website is a platform¹ for virtual (online) and on-site job fairs where employers can publish their company profiles and current job opportunities. Jobseekers can indicate their interest in specific job offers by making their user profile and CV visible for the employers they have selected. In virtual events, presentations can be streamed online and jobseekers, employers, and EURES staff can communicate with each other via live chats. Specific information regarding processing and protection of data submitted in the chats is provided in connection to the chat functionality.

Jobseekers and employers who register for a Job Day event will obtain a user account on the EOJD website for that specific event. Jobseekers can upload their personal profile and a CV to the EOJD website or request that a CV already published on the EURES portal becomes accessible from the EOJD website.

Employers registered on the EOJD website can only see the CVs and other information about a jobseeker if the jobseeker has indicated an interest in that particular employer.

Purpose:

It seeks to promote job mobility within Europe, by organizing on-site and on-line Europe-wide recruitment events. The purpose is to match jobseekers from one European country with employers from another one.

Newsletter

The European (Online) Job Days (EOJD) issues a specific newsletter for event organizers and employers.

Mutual learning events

The European Labour Authority organizes events to share past experiences among the event's organisers.

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

Only anonymized data will be used for statistical purpose

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

¹ The European (Online) Job Days (EOJD) platform is owned and managed by the European Labour Authority (ELA).

c. Any other, specify

3. Any other mode, specify

Description

Jobseeker: create an account, create a profile (with preferred options) upload their cvs and apply directly for job offers. Possibility to schedule on-line or face to face interviews with employers.

Online chat

Employer: create an account, participate into events, publish vacancies, get access to Cvs and organize their own events and interviews.

In case of a new process of personal data, with the data collected from the platform, each employer will be consider as a new Controller and will need to prepare their specific record and privacy statement following the General Data Protection Regulation (GRDP).

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

1.2.5 Comments on the processing of the data

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1.3 DATA SUBJECTS AND DATA CATEGORIES

1.3.1 Data subjects' categories

1. Internal to organisation	<input checked="" type="checkbox"/> Yes Authorised Staff in the Information and EURES Unit
2. External to organisation	<input checked="" type="checkbox"/> Yes Jobseekers Employers EURES Advisers/Event organiser

1.3.2 Data categories/fields

Indicate the categories of data that will be processed

Jobseeker:

Name, preferred language and e-mail address are mandatory for contact purposes. Other information is requested for statistical purposes: gender; nationality; country of residence and education level.

When creating and posting a CV, all information the user has included in the CV will be stored in addition to the personal data already entered in order to create the account.

Enquiries

The personal information related to the creation of an account for a jobseeker is limited to the data necessary to identify a particular person.

Employer:

A company or undertaking lawfully registered in the European Economic Area or Switzerland that fulfils the criteria established for the participation in a specific event can register for and participate in that European Job Day event, subject to the approval of the organiser of the event. The representative of the company will be requested to provide the company's name, address, size, activity sector and the name, function, telephone number, and e-mail address of the main contact person.

Enquiries

Newsletter:

Name, Surname, Organisation, Type of member (NCO, EURES Member/Partner), country, language and email.

Mutual learning events

Name, Surname, Organisation, Type of member, flight detail and accommodation for reimbursement.

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:

Information provided by the candidate concerning special needs, in order to provide the appropriate assistance (if needed).

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"/>
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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
Jobseekers data	Jobseekers' accounts that have been created for a specific Job Day event will be automatically deleted 12 weeks after the event, unless users choose to maintain the access of their account for a longer period (maximum 6 months after the event). Before the expiration of this period, a request of renewal of the user's consent will be sent before the deletion of the data and if accepted the data will be kept for another 6 months.
Employers data	Employer accounts will be automatically deleted 12 weeks after the event, unless users choose to maintain the access of their account for a longer period (maximum 12 months after the event). Before the expiration of this period, a request of renewal of the user's consent will be sent before the deletion of the data and if accepted the data will be kept for another 12 months.
Newsletter	Data is stored in the system as long as the registered user is active in the EURES network.
Mutual learning events	1 year after the event

Description

When creating a profile, users could choose between:

- Keep their data for 12 weeks after the specific event or
- maintain their account for a longer period (*6 months for jobseekers and 12 months for employers*).

A renewal for consent will be sent before the deletion of the data. If accepted, the data will be kept for another 6 months in case of the jobseekers or 12 months in case of employers.

The jobseeker and employers will have the possibility to delete/modify their data from the platform at any time.

Reimbursement will be dealt following the process described in the Record “DPR-ELA- 2022-0003 Managing award procedures for procurement and the execution of contracts”.

1.5 RECIPIENTS

Origin of the recipients of the data	
1. <input checked="" type="checkbox"/> Within the EU organization	Information and EURES Unit
2. <input checked="" type="checkbox"/> Outside the EU organization	Jobseekers Employers EURES Advisers ¹

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

Information and EURES Unit has no access to jobseekers profiles. Information and EURES Unit has only access to the contact details of the event organisers and aggregated data related to the event through a specific form. The external contractor of the Information and EURES Unit will have access to the personal data in order to facilitate the organisation of the event. At the most, the data will be deleted after 6 months of the event.

All portal users can access contact details of EURES advisers.

Jobseekers and employers can mutually enquire contact details.

Employers can search published jobseekers CVs.

Information on jobseekers' CVs is made available, for display purposes, to EURES Members of the organising and co-organising countries and employers registered, verified by the external contractor acting on behalf of the controller. If these organisations reprocess the CV information obtained, this

¹ EURES offers a network of advisers that can give information, help and assistance to jobseekers and employers through personal contacts. EURES advisers are trained specialists who provide the three basic EURES services of information, guidance and placement, to both jobseekers and employers interested in the European job market. There are more than 900 EURES advisers across Europe and the number is growing. Their contact details and addresses can be found on the page "[Search for EURES advisers](#)" in the section "EURES Services" of the portal or by clicking on the button "[Contact a EURES Adviser](#)" available on many of the portal's pages.

processing has to be in compliance with Regulation (EU) 2018/1725 and the General Data Protection Regulation (Regulation (EU) 2016/679), and they will be considered independent controllers.

Information on registered jobseekers or employers will not be disclosed to anybody external to the EURES network.

The data stored will not be used for sending out any kind of information to the registered users unless they have explicitly agreed to this apart from messages relating directly to the service, its availability and development, and surveys and the like conducted for evaluation purposes.

Only registered and accepted employers in which a jobseeker has explicitly indicated an interest - through marking an interest in one or several of this employer's job vacancies, or providing the jobseeker's registration code to the employer via the chat tool can view that jobseeker's CV.

1.6 INTERNATIONAL DATA TRANSFERS

Transfer to third countries or international organisations of personal data	
1. Transfer outside of the EU or EEA	
<input type="checkbox"/> N/A, transfers do not occur and are not planned to occur <input checked="" type="checkbox"/> YES,	
Country(ies) to which the data is transferred	EEA and Switzerland
3. Legal base for the data transfer	
<input type="checkbox"/> Transfer on the basis of the European Commission's adequacy decision (<i>Article 47</i>) <input type="checkbox"/> Transfer subject to appropriate safeguards (<i>Article 48.2 and .3</i>), 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. <input type="checkbox"/> Administrative arrangements between public authorities or bodies which include enforceable and effective data subject rights.	
<input type="checkbox"/> Transfer based on an international agreement (<i>Article 49</i>), specify	
4. Derogations for specific situations (Article 50.1 (a) –(g))	
<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).	
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) <input type="checkbox"/> 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 Personal Data Protection)

- External website (URL: <https://www.ela.europa.eu/en/privacy-policy>)

Other form of publication, specify

Privacy Statement will be attached in the platform.

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 available on ELA main website, under Data Protection Policy

1.8 SECURITY MEASURES

Short summary of overall Technical and Organizational Measures implemented to ensure Information Security:

Description:

After the commencement of the European Labour Authority's activity (August 1st, 2021) the Authority is replacing the European Commission (the "Commission") in managing the European Coordination Office of the European network of employment services (EURES).

However, according to Article 6 of Regulation 2019/1149 establishing a European Labour Authority, the Commission will continue to ensure the provision of IT and the operation and development of IT infrastructure.

Commission Decision (EU, Euratom) 2017/46 of 10 January 2017 on the security of communication and information systems in the European Commission

Specific measures in place:

Databases and repositories operate on controlled access, limited to the persons needing it.

Access to the secured parts of the EURES application is controlled through an authentication and authorization mechanism managed within the application.

Access to EURES environments from outside the European Commission is strictly limited to contractors responsible for the development and maintenance of EURES, through a Security Convention defined in collaboration with HR.DS.