



**European Labour Authority**

DATA PROTECTION OFFICER

**RECORD OF PROCESSING OPERATIONS ON PERSONAL DATA**

DPR-ELA-2023-0009 ELA communication services

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

**1.1 GENERAL INFORMATION**

<b>Record reference</b>	DPR-ELA-2023-0009
<b>Title of the processing operation</b>	ELA communication services
<b>Controller entity</b>	European Labour Authority, Governance Unit, Communications Sector
<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 Service providers for: audiovisual production services; audiovisual dissemination services audiovisual broadcasting services media management and archiving services IT development services duplication and digitisation services media monitoring services; translation and subtitling services  Microsoft Ireland South County Business Park, One Microsoft Place, Carmanhall and Leopardstown, Dublin, D18 P521, Ireland  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.
<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 type="checkbox"/> Yes <input checked="" 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 purpose of the processing is to facilitate the operation, maintenance and management of the services provided by the Communications Sector in the Governance Unit of the European Labour Authority (ELA). More specifically, data is collected in order to:

- ensure the preservation, distribution and communication to the public of current audiovisual production as well as the audiovisual heritage (video, audio and photo) of the European Labour Authority
- provide accurate and contextualised information about the media;
- ensure the copyright compliance of archiving and dissemination activities;
- respect legal obligations to the authors and co-operators, in particular their economic and paternity rights;
- facilitate the organisation, operation and promotion of corporate communication campaigns of the ELA;
- enable the Authority the production of anonymized statistics on downloads of material. These statistics will contain aggregated figures for number of downloads of online media, without any personal identification;

The Communications Sector of the ELA is in charge of the creation, preservation and dissemination of audiovisual coverage of the activities and policies of the ELA. It offers a wide range of media productions to a variety of institutional and non-institutional users free of charge for EU-related information and education purposes.

### 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

### 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
2.  Manual processing
  - a.  Word documents
  - b.  Excel sheet
  - c.  Any other, specify

### 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

**1.3 DATA SUBJECTS AND DATA CATEGORIES**

**1.3.1 Data subjects' categories**

1. Internal to organisation	Staff members of the European Labour Authority participating in one of the communication campaigns
2. External to organisation	External citizens. For the purpose of this record, the term 'citizens' intends to cover project owners, competition candidates, coordinators and other relevant stakeholders.

**1.3.2 Data categories/fields**

Indicate the categories of data that will be processed:

**Audiovisual services:**

Personal data available via audiovisual content that might be broadcasted and/or published on the internet/intranet in the context of the communication activities of the European Labour Authority:

- audio, visual and/or audiovisual recordings of persons
- Identification data: name, surname, nationality, function, signature, contact and location details (postal address, email, phone number, country of residence, IP address, device ID, cookie identifier, login and related metadata)

**Communication campaigns:**

Personal data of specific campaigns project owners, citizens, beneficiaries, and any other person related to the specific campaign: first name, last name, title, nationality, place of residence, function title, organisation name, phone number, e-mail address, social media account usernames, audio and video recordings of a data subject.

*Personal data of stakeholders/citizens provided by the European Union institutions, agencies and/or bodies, Member State representatives, EC Representations, the contractor, local partners, or on publicly available records: first name, last name, function title, organisation name, phone number, e-mail address.*

**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"/>
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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		
		Start date/moment	End date/moment
All personal data collected in the framework of corporate communication campaigns.	The data will be kept for a maximum period of twelve months after each respective campaign ends. Data will be automatically deleted at the end of this period.	Beginning of the communication campaign	Data will be automatically deleted at the end of the 12 (twelve) month period (i.e. after each respective communication campaign ends, including the reporting period).
Personal data available via audiovisual content	Selected audiovisual content may be stored for permanent preservation, according to specific retention list in the European Labour Authority.	Once audiovisual material is recorded	

Description

Personal data is kept for as long as follow-up actions are necessary with regard to the purpose(s) of the processing of personal data related to each communication campaign. Data older than the defined retention periods will be either removed or copied to an alternate system to be made anonymous and aggregated for statistical purposes.

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	General public EU institutions, bodies and/or organisations Member States' representatives

Categories of the data recipients
1. <input checked="" type="checkbox"/> A natural or legal person 2. <input checked="" type="checkbox"/> Public authority 3. <input checked="" type="checkbox"/> Agency 4. <input checked="" type="checkbox"/> Any other third party, specify
Specify who has access to which parts of the data:

Description

Access to personal data is provided to the European Labour Authority staff responsible for carrying out this processing operation and, to authorised staff according to the “need to know” principle, and to the contractor’s and subcontractor’s authorised staff. Such staff abide by statutory, and when required, additional confidentiality agreements.

The general public will only have access to the name, and surname, and – if applicable – job title, other details of their jobs and achievements, as well as any photos or videos created with a prior consent for the purpose of the campaign.

For the purpose of promoting communication activities of the European Union, the ELA may share information about the specific campaign with the European Institutions, agencies and/or bodies, Member States representatives or the general public.

**1.6 INTERNATIONAL DATA TRANSFERS**

<b>Transfer to third countries or international organisations of personal data</b>
<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 organisation(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>
<p><b>3. Derogations for specific situations (Article 50.1 (a) –(g))</b></p> <p><input checked="" type="checkbox"/> N /A</p> <p><input type="checkbox"/> Yes, derogation(s) for specific situations in accordance with article 50.1 (a) –(g) apply (ies).</p>

**1.7 INFORMATION TO DATA SUBJECTS ON THEIR RIGHTS**

<b>Rights of the data subjects</b>
<p><i>Article 17 – Right of access by the data subject</i></p> <p><i>Article 18 – Right to rectification</i></p> <p><i>Article 19 – Right to erasure (right to be forgotten)</i></p> <p><i>Article 20 – Right to restriction of processing</i></p> <p><i>Article 21 – Notification obligation regarding rectification or erasure of personal data or restriction of processing</i></p> <p><i>Article 22 – Right to data portability</i></p> <p><i>Article 23 – Right to object</i></p> <p><i>Article 24 – Rights related to Automated individual decision-making, including profiling</i></p>

**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  (SharePoint on personal data protection and Communications Sector )
- External website  (URL: <https://www.ela.europa.eu/en/privacy-policy> )

Other form of publication, specify

Prior consent to be sent together with the Privacy Statement.

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:**

For transparency reasons, specific information about the processing activities related to the corporate communication campaigns will be prepared.

**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.

In particular for this process:

Throughout this procedure only authorised people are attributed access rights and only on a "need-to-know" basis. Any possible security measure is taken to prevent any improper use of or unauthorized access to the electronic file. Procedure-related documents are kept in a secure environment.