

FRA Website and Web Services Data

The European Union Agency for Fundamental Rights (FRA) processes the personal data of a natural person in compliance with Regulation 2018/1725 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, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/EC.

This privacy notice explains FRA's policies and practices regarding its collection and use of your personal data, and sets forth your privacy rights. We recognise that information privacy is an ongoing responsibility, and we will update this notice where necessary.

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1. Why do we collect personal data?

The Agency collects personal data for:

- Storing user settings and preferences such as presence of javascript, font size and to keep track of your cookie consent preferences. This enables the Agency to provide an improved user experience as the user does not have to keep re-entering the same data whenever they re-visit the FRA website. These cookies expire when you close your browser and are first-party cookies.
- Storing analytics cookies to collect your browsing experience on our website for anonymised statistics. The purpose of this tracking is to improve our communication and the service we offer. Our analytic cookies are first-party cookies. FRA retains full control of the data collected through first-party cookies by storing the data in servers fully owned and controlled by the Agency itself.
- 3. Enabling the playback of videos if the user has consented to the use of such cookies.
- Other purposes are (i) to enable FRA to provide the subscribed users with services regarding recruitment, access to documents and (ii) to provide a more personalised service via e-mail alerts, etc.

2. What kind of personal data does the Agency collect?

The data processed consist of the following categories:

1. A) Cookies: session cookies containing user settings and preferences (e.g. font size, language, etc.). For other cookies see 1. B), 2. B) below.

When a user first visits the website, they are informed about the cookies and analytics used via a banner based on the EU Commission's Cookie Consent Kit. If the user declines to accept cookies, a first party cookie is set with the user preference and no further cookies are set, and no user tracking is done (see section 1b below). In any other sections of the website requiring the use of cookies, for example viewing videos, a message will be displayed in place of the restricted content to say that content is not available because these specific cookies have not been accepted. For more details, see the <u>Cookies page</u>.

1. B) Analytics: first-party cookie containing unique user ID; IP address of visitors anonymised with 2 bytes masked; browsing information (e.g. pages visited or files downloaded).

The analytics tool used is Matomo, which has been recommended by various independent bodies (ULD, Germany and CNIL, France) as privacy-compliant web analytics software. When a user first visits the website, they are informed about the cookies and analytics used via a banner. The JavaScript tracking function of the analytics software (Matomo) requires cookies to work, therefore if the user declines to accept cookies no user tracking is done. If the user accepts cookies, a first party Matomo cookie is set containing a unique user ID and the user's browsing information is sent to the web analytics software which is hosted on FRA web server located in Bilbao, Spain. In addition, server logbased analytics store browsing information including an anonymised IP address with 2 bytes masked on the FRA web server. The user can revoke their consent to be tracked at any time in the <u>Cookies page</u>.



2. A) Applicants for vacancies, selections or internships: user name, address, contact details, date of birth, gender, nationality, languages, education and qualifications, work history.

Users who apply for vacancies, selections or internships are requested to submit certain personal data including name, address, and contact details as part of their application. For full details see the Privacy statement on recruitment and the Privacy statement on internship on the <u>Data Protection page</u>.

2. B) Subscribers to e-mail alerts: Name, e-mail address.

Users may subscribe to FRA e-mail alerts to receive monthly or weekly updates on themes of their choice. Subscribers to e-mail alerts are requested to provide their name and e-mail address when subscribing. They may edit their data at any time or delete their data entirely by logging in to their user account and clicking the "Cancel account" button. An automated process ensures that 12 months after the registration, the user has to confirm the subscription or they will be removed from the system.

2. C) Users who request access to documents: name, address, contact details.

Users who request access to documents are requested to submit certain personal data including name, address, and contact details as part of their application. For full details see the Information note for data subjects requesting access to documents on the <u>Data Protection page</u>.

2. D) Users who get in touch with us via the Contact form: Email address...

Users who request access to documents are requested to submit certain personal data including name, address, and contact details as part of their application. For full details see the Information note for data subjects requesting access to documents on the <u>Data Protection page</u>.

2. E) Users who take part in online surveys or consultations: varies according to survey. For more details, see the specific Information notes accompanying the surveys and consultations, which can be found on the starting page of each online survey or consultation and also on the <u>Data Protection page</u>.

3. How do we collect your personal data?

When you use our websites, if you give your consent we collect the following information:

First-party cookies for the technical functioning of the website

This website is run on the Drupal content management system (CMS). Drupal sets some cookies in order to improve the user experience and assist in the delivery of the site (e.g. to test whether a user has JavaScript enabled.) The following cookies are set by Drupal on this site:

| Cookie name | Domain | | Purpose |
|-------------|--------|--------|---------|
| | | / Max- | |



| | | Age | |
|-------------------|---------------|---------|---|
| fs | fra.europa.eu | Session | Stores the font size that the user has selected. |
| has_js | fra.europa.eu | Session | Informs the content management system whether you have javascript enabled in your browser settings. It can deliver content in a suitable way depending on your settings. It expires when you close the browser. |
| eu_cookie_consent | .europa.eu | Session | Informs the content management system whether you have consented to accept aggregated analytics cookies and YouTube cookies. |

First-party cookies used by Matomo Analytics

We use Matomo web analytics to monitor and evaluate the effectiveness and efficiency of the FRA website.

Matomo is an open-source analytics platform which fully is controlled by FRA. This platform enables the protection of end-user personal data thanks to features such as IP address deidentification. On top of that, the FRA has created a feature to manage users' consent to the collection of users' browsing experience for anonymised statistics.

| Cookie name | Domain | Expires / Max- Age | Purpose |
|-------------|---------------|-----------------------|---|
| _pk_id. | fra.europa.eu | 13 months | To track whether a user is new to the site or a repeat visitor. |
| _pk_ses. | fra.europa.eu | 30 minutes | To track which pages were visited |

Data protection information and measures in Matomo

Matomo is configured to store first-party cookies.

Cookies (from Matomo) enable FRA to track the following information about visitors. We use this information to prepare aggregated, anonymous statistics reports of visitors' activity:

- IP address (with 2 bytes masked)
- Location: country, region, city, approximate latitude and longitude (Geolocation)
- Date and time of the request (visit to the site)
- Title of the page being viewed (Page Title)
- URL of the page being viewed (Page URL)
- URL of the page that was viewed prior to the current page (Referrer URL)



- Screen resolution of user's device
- Time in local visitor's time-zone
- Files that were clicked and downloaded (Download)
- Links to an outside domain that were clicked (Outlink)
- Pages generation time (the time it takes for webpages to be generated by the webserver and then downloaded by the visitor: Page speed)
- Main language of the browser being used (Accept-Language header)
- Browser version, browser plugins (PDF, Flash, Java, ...) operating system version, device identifier (User-Agent header)
- Language of the visited page
- Campaigns
- Site Search

FRA retains full control of the data collected through first-party cookies by storing the data in servers fully owned and controlled by the Agency itself.

Besides some session cookies, a random ID persistent cookie is generated by Matomo, which allows FRA to identify when a user returns to the site. This cookie has an expiration date of 13 months, after which it is automatically removed from the user's device.

If you consent to watch YouTube videos on our website the following third-party cookies will be set by YouTube:

| Cookie name | Domain | Expires / Max-Age | Purpose |
|-------------|----------------|----------------------|--|
| 1P_JAR | .google.com | 1 month | Collects website statistics and tracked conversion rates. |
| CONSENT | .google.com | 20 years | This cookie is used to save the user's preferences and other information. This includes in particular the preferred language, the number of search results to be displayed on the page as well as the decision as to whether the Google SafeSearch filter should be activated or not. |
| DV | www.google.com | 7 minutes | This cookie is used to save the user's preferences and other information. This includes in particular the preferred language, the number of search results to be displayed on the page as well as the decision as to whether the Google SafeSearch filter should be activated or not. |



| GPS | .youtube.com | 1 day | Registers a unique ID on mobile devices to enable tracking based on geographical GPS location. |
|--------------------|------------------|----------|--|
| IDE | .doubleclick.net | 1 year | Used by Google DoubleClick to register and report the website user's actions after viewing or clicking one of the advertiser's ads with the purpose of measuring the efficacy of an ad and to present targeted ads to the user. |
| NID | .google.com | 6 months | Registers a unique ID that identifies a returning user's device. The ID is used for targeted ads. |
| PREF | .youtube.com | 8 months | Registers a unique ID that is used by Google to keep statistics of how the visitor uses YouTube videos across different websites. |
| VISITOR_INFO1_LIVE | .youtube.com | 179 days | Tries to estimate the users' bandwidth on pages with integrated YouTube videos. |
| YSC | .youtube.com | Session | Registers a unique ID to keep statistics of what videos from YouTube the user has seen. |

4. Who is responsible for the processing your personal data?

The Agency is the legal entity responsible for the processing of your personal data and determines the objective of this processing activity. The Head of Communications & Events Unit is responsible for this processing operation. Nicole.Romain@fra.europa.eu

The data is also processed by the FRA's hosting contractor as the data is stored on secure servers in the EU by Sarenet S.A.U.

Data may also be processed by FRA's web development contractor EWorx.

5. Which is the legal basis for this processing operation?

The lawfulness of the processing of personal data is found under under Article 5(a) of the Regulation (EU) No 2018/1725.

The processing is lawful because "the data subject has unambiguously given his or her consent". Therefore, you have the right to withdraw your consent at any time, and we will delete your data or restrict its processing.



In addition, since the participation in the data collection as described in points 1 and 2 above is not mandatory, the processing of the personal data is also in accordance with Article 5(d) of Regulation (EU) No 2018/1725.

6. Who can see your data?

During this process, your personal data can be accessed by:

- 1. The selected FRA staff of the relevant units;
- 2. The authorised staff of the FRA web development and hosting contractors based in EU countries that are compliant with the EU Data Protection Regulation.

7. Do we share your data with other organisations?

Personal data is processed by the Agency only. In case that we need to share your data with third parties, you will be notified to whom your personal data has been shared with.

8. Do we intend to transfer your personal data to Third Countries/International Organizations?

The data stored in YouTube cookies are accessible by YouTube.

9. When will we start the processing operation?

The date when the data subject visits the website and, where applicable, the data subject submits personal data (e.g. subscribers to email alerts, applicants for vacancies, etc.).

10. How long do we keep your data?

1. A) Cookies: Session cookies – expire at the end of session; Email subscription cookies – 1 year; Analytics cookies – 13 months;

1. B) Analytics: Matomo log data – 180 days; Web server log data – 54 weeks;

2. A) Applicants for vacancies, selections or internships: 5 years;

2. B). Subscribers to e-mail alerts: 1 year;

2. C), 2. D), 2. E) Other subscribed users: varies – see the individual Information notes for details (see links in section Processing Operations above) on the <u>Data Protection page</u>.

11. How can you control your data?

You can access, modify or delete your personal data by sending an email request to <u>webfeedback@fra.europa.eu</u>. More details are provided below.



11.1. How valuable is your consent for us?

Since the processing is lawful because "the data subject has unambiguously given his or her consent". Therefore, you have the right to withdraw your consent at any time, and we will delete your data or restrict its processing.

11.2. Your data protection rights

Under data protection law, you have rights we need to make you aware of. The rights available to you depend on the aim of processing of your information. You are not required to pay any charges for exercising your rights.

a. Can you access your data?

You have the right to receive confirmation whether or not we process your personal data. Furthermore, you can have access to such data, as well as obtain copies of your data undergoing processing, at any time and free of charge, by sending an email request to <u>webfeedback@fra.europa.eu</u>. The Agency will address the request within 15 working days from the receipt of the request.

b. Can you modify your data?

You have the right to ask us to rectify your data you think is inaccurate or incomplete at any time by sending an email request to <u>webfeedback@fra.europa.eu</u>. The Agency will address the request within 15 working days from the receipt of the request.

c. Can you restrict us from processing your data?

You have the right to block the processing of your personal data at any time by sending an email request to <u>webfeedback@fra.europa.eu</u>, when you contest the accuracy of your personal data or when the Agency no longer needs the data for completing its tasks. You can also block the processing activity when the operation is unlawful, and you oppose to the erasure of the data. The Agency will address the request within 15 working days from the receipt of the request.

d. Can you delete your data?

You have the right to ask us to delete your data when the processing activity is unlawful, at any time by sending an email request to <u>webfeedback@fra.europa.eu</u>. The Agency will address the request within 15 working days from the receipt of the request.

e. Can you request the transfer of your data to a third party?

This only applies to information you have given us. You have the right to ask that we transfer the information you gave us from one organisation to another, or give it to you. The right only applies if we are processing information based on your consent or under, or in talks about entering into a contract and the processing is automated.



f. Do you have the right to object?

Yes, you have the right to object at any time by sending an email request to <u>webfeedback@fra.europa.eu</u>, when you have legitimate reasons relating to your particular situation. Moreover, you will be informed before your information is disclosed for the first time to third parties, or before it is used on their behalf, for direct marketing purposes.

The Agency will address your requests within 15 working days from the receipt of the request.

g. Do we do automated decision making, including profiling?

No.

12. What security measures are taken to safeguard your personal data?

The Agency has several security controls in place to protect your personal data from unauthorised access, use or disclosure. We keep your data stored on computer systems with limited access to a specified audience only.

13. What can you do in the event of a problem?

a) The first step is to notify the Agency by sending an email to webfeedback@fra.europa.eu and

ask

us to take action.

b) The second step, if you obtain no reply from us or if you are not satisfied with it, contact our data protection officer (DPO) at <u>dpo@fra.europa.eu</u>.

c) At any time you can lodge a complaint with the EDPS at <u>http://www.edps.europa.eu</u>, who will examine your request and adopt the necessary measures.

14. How do we update our privacy notice?

We keep our privacy notice under regular review to make sure it is up to date and accurate.

END OF DOCUMENT