

**RECORD OF PROCESSING ACTIVITY
ACCORDING TO ARTICLE 31 REGULATION 2018/1725¹
NOTIFICATION TO THE DATA PROTECTION OFFICER**

NAME OF PROCESSING OPERATION²: FRA 'EU Charter of Fundamental Rights Experts Event' on 6-7 October 2022 in Vienna, Austria

Reference number: DPR-2022-167
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Part 1 (Publicly available)

1) Controller(s)³ of data processing operation (Article 31.1(a))
<p>Controller: European Union Agency for Fundamental Rights (FRA) Schwarzenbergplatz 11, A-1040 Vienna, Austria Telephone: +43 1 580 30 – 0 Email: contact@fra.europa.eu Organisational unit responsible⁴ for the processing activity: Institutional Cooperation and Networks Unit Contact details: Charter@fra.europa.eu Data Protection Officer (DPO): dpo@fra.europa.eu</p>

2) Who is actually conducting the processing? (Article 31.1(a))⁵
<p>The data is processed by the FRA itself <input checked="" type="checkbox"/></p> <p>The data is processed also by a third party (event contractor: MCI Benelux S.A.) <input checked="" type="checkbox"/></p>

¹ <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32018R1725>

² **Personal data** is any information relating to an identified or identifiable natural person, i.e. someone who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity. This information may, for example, be the name, date of birth, a telephone number, biometric data, medical data, a picture, professional details, etc.

Processing means any operation or set of operations which is performed on personal data, whether or not by automatic means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

³ In case of more than one controller (e.g. joint FRA research), all controllers need to be listed here

⁴ This is the unit that decides that the processing takes place and why.

⁵ Is the FRA itself conducting the processing? Or has a provider been contracted?

MCI Benelux S.A. supports the registration and the logistics of the organisation of the event through a framework contract with DG SCIC EU-FRA-events@mci-group.com.

And additionally, sub-processors:

- For registration purposes: [Aventri \(privacy policy\)](#)
- For travel & accommodation: [Eagle Travel](#); Accommodation is at the [LINDNER Hotel am Belvedere](#), which will act as separate controller.

3) Purpose of the processing (Article 31.1(b))

Why are the personal data being processed? Please provide a very concise description of what you intend to achieve with the processing operation. Specify the rationale and underlying reason for the processing and describe the individual steps used for the processing. If you do this on a specific legal basis, mention it as well (e.g. staff regulations for selection procedures).

The purpose of the processing of your personal data is to the organisation of the FRA – EU Charter of Fundamental Rights Experts Event (hereinafter: the event), which will take from 6 to 7 October 2022 at the FRA premises in Vienna. This includes the handling of participants' and speakers' invitation, registration and attendance and their travel and accommodation arrangements, ensuring security aspects, granting participants and speakers access to the venue, minutes taking at the event, as well as event follow-up actions, i.e. possible reimbursements of costs and payment of speakers' fees, establishing and sharing contact lists and presentations among participants, feedback collection, reporting on the event, collecting event outputs and participants' statements where relevant and where participants' consent is provided, as well as photos and/or video/audio recordings of the event for reporting and/or publication on the FRA website for public information and promotion purposes. And event evaluation will be done anonymously.

4) Description of the categories of data subjects (Article 31.1(c))

Whose personal data are being processed?

FRA staff

Non-FRA staff (nat. Charter experts invited as participants/speakers to this event)

5) Categories of personal data processed (Article 31.1(c))

Please tick all that apply and give details where appropriate

(a) General personal data (add or delete as appropriate – the data in the brackets are only examples)

Personal details: (academic) title(s), name(s), surname(s), nationality (if required for travel arrangements)

Contact details: email address, mobile phone number, country of residence incl. town of travel departure and return

Education & Training details

Employment details: role/job title, name and type of the employer/organisation

Financial details: financial identification form and bank account information

Family, lifestyle and social circumstances

Goods or services provided

Other (please give details):

- Statements, photos, video/audio recordings of the participants
- Cookies: The collection of registration data and email campaigns will be managed via the software Aventri. The system uses essential cookies and cookies to improve your website experience and to generate anonymous, aggregate user statistics. Aventri only stores the data for the Contractor (MCI Benelux S.A.) who is the organiser of this event. Event reminder emails and a post-event follow-up email will be sent through Aventri. For further information on cookies and the management thereof, please refer to [Aventri's cookie policy](#);
- Event reminder emails and a post-event follow-up email will be sent through Aventri.
- IP address (please refer to [Aventri's Privacy Policy](#))

(b) Special categories of personal data (Article 10)

The personal data collected reveal:

Racial or ethnic origin (through photos and video recordings)

Political opinions

Religious or philosophical beliefs

Trade union membership

Genetic, biometric or data concerning health/disability (possibly revealed by dietary needs, additional needs, or specific access requirements)

Information regarding an individual's sex life or sexual orientation

(c) **Personal data relating to criminal convictions and offences** (Article 11)

Criminal record (or similar, e.g. declaration of good conduct)

N/A

Others:

The collection of registration data and email campaigns will be managed via the software **Aventri**. The system uses essential cookies and cookies to improve your website experience and to generate anonymous, aggregate user statistics. Aventri only stores the data for the Contractor (MCI Benelux S.A). Event reminder emails and a post-event follow up email will be sent through Aventri ([cookie policy](#)). The only cookies that will be collected during the registration process for this event are 1st Party cookies according to the aforementioned cookie policy.

Neither of these cookies can read or access other cookies or any data from a user's hard drive. Further, neither of these cookies alone will personally identify a user; however, a cookie will recognize a user's individual web browser or device through an IP Address, browser version, operating system and other information.

6) Recipient(s) of the data (Article 31.1 (d))

*Recipients are all parties who have access to the personal data. Who will have access to the data **within** FRA? Who will have access to the data **outside** FRA? No need to mention entities that may have access in the course of a particular investigation (e.g. OLAF, EO, EDPS).*

Designated **FRA** staff members

A restricted number of staff members in charge or involved of the organisation of this event can access the data.

Recipients **outside** FRA:

MCI Benelux S.A. (EU-FRA-events@mci-group.com)

Aventri (support@aventri.com)

Travel agency and hotel for travel and accommodation, i.e. [Eagle Travel](#) and [LINDNER Hotel am Belvedere](#).

7) Transfers to third countries or international organisations (Article 31.1 (e))⁶

If the personal data are transferred outside the European Economic Area or to international organisations, this needs to be specifically mentioned, since it increases the risks of the processing operation.

⁶ **Processor** in a third country using standard contractual clauses, a third-country public authority you cooperate with based on a treaty. If needed, consult your DPO for more information on how to ensure safeguards.

Transfer outside of the EU or EEA

Yes

No

If yes, specify to which country:

Transfer to international organisation(s)

Yes

No

Aventri is a non-EU based service provider, but it will store the personal data on EU-based servers. Standard Contractual Clauses are in place with this service provider. Additional safeguards (end-to-end encryption) are also in place.

If yes specify to which organisation:

Legal base for the data transfer

Transfer on the basis of the European Commission's adequacy decision (Article 47)

Transfer subject to appropriate safeguards (Article 48.2 and .3), specify:

a) A legally binding and enforceable instrument between public authorities or bodies.

Standard data protection clauses, adopted by

b) the Commission, or

c) the European Data Protection Supervisor and approved by the Commission, pursuant to the examination procedure referred to in Article 96(2) .

d) Binding corporate rules, Codes of conduct , 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.

Subject to the authorisation from the European Data Protection Supervisor:

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.

Administrative arrangements between public authorities or bodies which include enforceable and effective data subject rights.

Transfer based on an international agreement (Article 49), specify:

Derogations for specific situations (Article 50.1 (a) –(g))

N /A

Yes, derogation(s) for specific situations in accordance with article 50.1 (a) –(g) apply 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) 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

8) Retention time (Article 4(e))

How long will the data be retained and what is the justification for the retention period? Please indicate the starting point and differentiate between categories of persons or data where needed (e.g. in selection procedures candidates who made it onto the reserve list vs. those who didn't). Are the data limited according to the adage "as long as necessary, as short as possible"?

Personal data will be kept after the event to ensure implementing necessary follow-up activities with regard to the purpose(s) of the processing of personal data as well as for its related management. Data necessary for financial purposes (reimbursement of expenses, etc.) are kept according to the rules set in the Regulation (EU, Euratom) 2018/1046. Personal data related to registration and participation will be retained by FRA for a period of 2 years after the end of the event.

Statements, photos and video/audio recordings are stored in the FRA Institutional Cooperation and Networks Unit respective project library (which is accessible only to designated FRA staff) in FRA's data management system (DMS) for one year. In this respect, please see [FRA's privacy notice regarding the use of Microsoft Office 365](#). Information concerning the event on the FRA corporate website will be retained for five years.

MCI Benelux S.A. will keep the participants list for no longer than the date of 31 December 2022. After that date, the registration data will be purged from Aventri. The dietary needs, additional needs, and the specific access requirements (if any) will be kept for no longer than 2 weeks after the event.

9) Technical and organisational security measures (Article 31.1(g))

Please specify where/how the data are stored during and after the processing; please describe the security measures taken by FRA or by the contractor

How is the data stored?

- Document Management System (DMS), according to [FRA's privacy notice regarding the use of Microsoft Office 365](#)
- FRA network shared drive
- Outlook Folder(s)
- CRM
- Hardcopy file
- Cloud (see [FRA's privacy notice regarding the use of Microsoft Office 365](#))
- Servers of external provider (i.e. Aventri, see their [privacy policy](#))
- Other (please specify).

10) Exercising the rights of the data subject (Article 14 (2))

How can people contact you if they want to know what you have about them, want to correct or delete the data, have it blocked or oppose to the processing? How will you react?

See further details in the Data Protection notice: e-mail to Charter@fra.europa.eu.

Data subject rights

- Right of access
- Right to rectification
- Right to erasure (right to be forgotten)
- Right to restriction of processing
- Right to data portability
- Right to object
- Notification obligation regarding rectification or erasure of personal data or restriction of processing
- Right to have recourse
- Right to withdraw consent at any time