

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

NAME OF PROCESSING OPERATION²: Event ‘Putting human rights at the heart of Europe’s future’, Human Rights Leaders and Experts Meeting on 7-8/09/2022 in Rust, Austria.

Reference number: DPR-2022-164
Creation date of this record: 12/07/2022
Last update of this record: 05/09/2022
Version: 2

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: https://fra.europa.eu/en/contact Organisational unit responsible⁴ for the processing activity: Communications and Events Unit Contact details: event@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 (contractor-data processor) <input 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.

Boulevard de Souverain 280

1160 Brussels

Belgium

+32 2 320 25 03

Contact point at external third party: EU-FRA-events@mci-group.com

The contractor supports with the registration and the logistics of the organization of the events through a framework contract with DG SCIC.

And additionally, sub-processors:

- For registration purposes: [Aventri](#)
- For Travel: The full name of the participant will be shared with the travel agency, [Eagle Travel](#)
-

Touché Videoproduktion OG,

Thaliastraße 2/17

1160 Vienna, Austria

+43 1 23 99 145

Contact point at external third party: office@touchevideoproduktion.com

The contractor will provide the photographic and video recordings services. A contract between FRA and Touché Videoproduktion OG has been signed for this purpose.

Meeting venue and accommodation is organised at the [Seehotel Rust](#) 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 the personal data is to organize the Human Rights Leaders & Experts Meeting (hereinafter: the event).

FRA is responsible together with the contractor MCI Benelux S.A, for the overall organization of the event and the communication with the participants before and after the end of the meetings. FRA has collected publicly available email addresses and email addresses from participants of the Fundamental Rights Forum 2021 who had consented to further communication.

The purpose of the processing of personal data is handling registration and attendance, organizing travel and accommodation, granting access to the venue, reporting on the event; as well as event follow-up actions, such as sharing presentations and personal descriptions among participants and feedback collection. It includes in particular, mailing lists for contacts, invitations to participants, reports, minutes, distribution of reports/minutes, meeting follow-up, photographs, video recordings and audio recording of moderators and participants only for note-taking purposes, based on their explicit consent. Participants may also choose to share a short bio (e.g. name, organisation, email address) with other participants of this meeting

During the registration, the collection of the necessary data will be managed by MCI Benelux S.A through a registration form provided via the software Aventri.

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

Whose personal data are being processed?

- | | |
|--|-------------------------------------|
| FRA staff | <input checked="" type="checkbox"/> |
| Non-FRA staff (Invited Guests, Moderator, Journalists) | <input checked="" type="checkbox"/> |

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 (name, surname, country, short description/bio, video recordings and photographs) | <input checked="" type="checkbox"/> |
| Contact details (email address, mobile phone number) | <input checked="" type="checkbox"/> |
| Employment details (Name and type of the employer/organization, function/title) | <input checked="" type="checkbox"/> |
| Financial details (financial identification form, bank account information) | <input type="checkbox"/> |
| Family, lifestyle and social circumstances | <input type="checkbox"/> |
| Goods or services provided | <input type="checkbox"/> |

Other (please give details):

- Photographs and video clips of all participants (with full respect to the Chatham House Rule)
- Audio recordings of the participants and moderator (only for note-taking purposes).
- 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). 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](#).
-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
photographs and video recordings might reveal racial or ethnic origin. | <input checked="" type="checkbox"/> |
| Political opinions
photographs and video recordings might reveal political opinions | <input checked="" type="checkbox"/> |
| Religious or philosophical beliefs
photographs and video recordings might reveal religious or philosophical beliefs | <input checked="" type="checkbox"/> |
| Trade union membership | <input type="checkbox"/> |
| Genetic, biometric or data concerning health (data concerning health might be revealed by information on dietary requests or allergies and special needs/accessibility requirements, if any) | <input checked="" type="checkbox"/> |
| Information regarding an individual's sex life or sexual orientation | <input type="checkbox"/> |
| N/A | |

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

- | | |
|---|--------------------------|
| Criminal record (or similar, e.g., declaration of good conduct) | <input type="checkbox"/> |
| N/A | <input type="checkbox"/> |

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 of the organisation of the meetings can access the data.

Recipients **outside** FRA:

- Designated staff-project team members from MCI Benelux S.A. (EU-FRA-events@mci-group.com)
- Aventri (support@aventri.com) – please also refer to Aventri’s [Privacy Policy](#)
- [Eagle Travel](#)
- [Seehotel Rust](#)
- [Touché Videoproduktion OG](#) staff-project team members from Touché Videoproduktion (office@touchevideoproduktion.com)

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.

Transfer outside of the EU or EEA

Yes

No

Note: 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 country:

Transfer to international organisation(s)

Yes

No

Legal base for the data transfer

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

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 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 necessarily follow up activities with regard to the purpose(s) of the processing of personal data as well as for its related management. Personal data related to registration and participation will be retained by FRA for a period of 2 years after the event.

Photos and Audio recordings are stored in an FRA Communication and events Unit drive for 12 months. 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 requests 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) | <input checked="" type="checkbox"/> |
| FRA network shared drive | <input type="checkbox"/> |
| Outlook Folder(s) | <input checked="" type="checkbox"/> |
| CRM | <input type="checkbox"/> |
| Hardcopy file | <input type="checkbox"/> |
| Cloud (give details, e.g. cloud provider)
FRA dms is hosted in the cloud (see notice MS 365) | <input checked="" type="checkbox"/> |
| Servers of external provider | <input checked="" type="checkbox"/> |
| 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 event@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

Part 2 – Compliance check and risk screening (internal)

11) Lawfulness of the processing (Article 5(a)–(e))⁷: Processing necessary for:

Mention the legal basis which justifies the processing and assess that the purposes specified are purposes specified, explicit, legitimate.

⁷ Tick (at least) one and explain why the processing is necessary for it. Examples:

(a) a task attributed to your EUI by legislation, e.g. procedures under the staff regulations or tasks assigned by an Agency's founding regulation. Please mention the specific legal basis (e.g. "Staff Regulations Article X, as implemented by EUI IR Article Y", instead of just "Staff Regulations")

(a2) not all processing operations required for the functioning of the EUIs are explicitly mandated by legislation; recital 17 explains that they are nonetheless covered here, e.g. internal staff directory, access control.

(b) a specific legal obligation to process personal data, e.g. obligation to publish declarations of interest in an EU agency's founding regulation.

(c) this is rarely used by the EUIs.

(d) if persons have given free and informed consent, e.g. a photo booth on EU open day, optional publication of photos in internal directory;

(e) e.g. processing of health information by first responders after an accident when the person cannot consent.