

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

NAME OF PROCESSING OPERATION²:

Regional meeting of the OECD Civic Space Network for Public Officials in cooperation with the EU Agency for Fundamental Rights (FRA), taking place on 18-19 March 2026, in Vienna.

Reference number: DPR-2026-256 (to be completed by the DPO)
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Part 1 (Publicly available)

1) Controller(s)³ of data processing operation (Article 31.1(a))
<u>Controller</u> : 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 EU Charter Unit Contact details: fra-civicspace@fra.europa.eu Data Protection Officer (DPO): dpo@fra.europa.eu <u>Joint-Controller</u> : Organisation for Economic Cooperation and Development (OECD) 2, rue André Pascal, 75016 Paris, France Data Protection Officer (DPO): dpo@oecd.org

Reco¹ <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.

FRA and OECD are joint controllers for this processing operation. Their respective roles and responsibilities are defined in the agreement signed for the purposes or the co-organisation of this event.

2) Who is actually conducting the processing? (Article 31.1(a))⁵

The data is processed by the FRA itself

The data is processed also by a third party (contractor)

Consortium SPECTRA, led by ICF Next S.A. Avenue Marnix 17, 1000 Brussels, acting as processor, which supports the logistics of the organisation of the events through a contract signed with FRA under an interinstitutional framework contract RTD/2023/OP/0032 lead by DG RTD.

The meeting is co-organised jointly with OECD. OECD sends out invitations to their respective list of possible invitees from their Civic Space Network for Public Officials, and FRA sends out invitations to their respective list of possible invitees, including contacts identified through the National Liaison Officers and FRA's existing contacts. FRA, together with its processor, compiles and maintains the complete list of registered participants, including those invited by OECD and FRA, for the sole purpose of organising and following up on the meeting.

Contact point at external third party:

DPO of ICF: dataprotection@icf.com

And additionally:

- For travel & accommodation: data will be shared with the travel agency (IP Travel; see their [privacy policy](#) for more information) and hotel (Intercontinental Hotel Vienna; see their [website](#) for more information), acting as sub-processors.
- For registration, the consortium SPECTRA uses the EU Survey site (see their [privacy policy](#) for more information).

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

Why are the personal data being processed? Please provide a 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 that FRA and OECD co-organise the 'Regional meeting of the OECD Civic Space Network for Public Officials', taking place on 18-19 March 2026, in Vienna at FRA premises.

The OECD and FRA are responsible for determining the content of the meeting, the structure and format of the agenda, identification and management of speakers and participants, separately sending out invitations to possible participants, along with communication with each other about the meeting before, during and after.

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

FRA is responsible for the overall organisation of the event and communication with the participants before and after the end of the meetings. The processing activities include handling registration and attendance, organising travel and accommodation arrangements for some participants, granting access to the venue, the logistical work and additional equipment necessary for hosting the event, the organisation of the catering during the meeting at FRA premises on 18 and 19 March and the dinner at a restaurant on 18 March 2026, reporting on the event, as well as event follow-up actions, such as sharing presentations among participants and feedback collection. It includes, in particular, mailing lists for contacts, distribution of reports/minutes, meeting follow-up, and written notes of the meetings for the purpose of minutes taking and reporting.

To carry out the activities above, FRA is supported by its external contractor Spectra, acting as a processor (details under section 2).

OECD sends out invitations to their respective list of possible invitees from their Civic Space Network for Public Officials, and FRA sends out invitations to their respective list of possible invitees, including contacts identified through the National Liaison Officers and FRA's existing contacts.

The invitation includes a registration link to the EU Survey. Upon receipt of the invitation, participants are invited to register for the event via the EU Survey link administered by FRA's processor, Spectra. Spectra will receive participants' personal data submitted via the registration form for the purpose of completing the above outlined responsibilities pertaining to the organisation and follow up of the meeting.

FRA, together with its processor, compiles and maintains the complete list of registered participants, including those invited by OECD and FRA, for the sole purpose of organising and following up on the meeting. This consolidated list, including contact details and other personal data of participants processed for the purposes of organising the meeting, is not shared with the OECD. However, where participants provide their explicit consent via the registration form, only their name, surname, organisation and email address will be included in a separate participants list, which may be shared with other participants and with the OECD at the end of the meeting.

The meeting is an in-person meeting. However, there could be the chance of dropouts of speakers, and the solution could be connecting one or more participants via an online link (Teams). The meeting in this case would become hybrid. This is however a very remote possibility.

Based on consent via the registration form, as a follow up to the event, FRA and OECD will share the list of participants with name, surname, organisation, and email addresses amongst other participants.

FRA is responsible for the photography of participants at the meeting. Participants will be asked to give consent on the registration form to the event and to share them on FRA and OECD websites and/or social media. In case you wish to not be photographed, arrangements will be put in place to ensure this.

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	<input checked="" type="checkbox"/>

(Participants to the meeting, which include policy makers, public authorities, national human rights institutions, equality bodies, data protection officers, non-governmental organisations, service providers, social partners, experts, officials from EU or UN organisations)

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: first name, middle name (optional) surname, title, personal pronoun, country of residence

The following data is collected for participants whose travel and accommodation will be organised by FRA: date of birth (for those requiring flight tickets), ID/passport number (for those travelling outside the EU) and the date of expiry of the travel document (for non-EU citizens)

Contact details: email address, mobile phone number

Education & Training details

Employment details (organisation/ministry, job title/function)

Financial details:

Family, lifestyle and social circumstances

Goods or services provided

Other:

- For participants for whom travel and accommodation is organised:
 - City of departure and return
 - Means of transport
 - Date and time of departure to Vienna
 - Date and time of return from Vienna
 - Specific requirements for accommodation and travel
- EUSurvey uses the Europa Analytics service for traffic statistics and analytics. For further information see the [Europa Analytics](#) website, where information can be found about the cookies and IP address collected by the European Commission website, as well as its [cookies policy](#)
- Pictures of participants might be taken during the event and shared on FRA and OECD websites and/or social media, upon consent.
- Photo and bio of speakers and moderators

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

Data concerning health and/or religious beliefs, such as dietary requirements and accessibility, necessary for the organisation of the catering services and access to the venue may be collected from participants, upon consent, if they have previously declared in the registration that they have such special requirements.

The photo of speakers and moderators provided with the bio, as well as image of participants being photographed at the event might reveal racial or ethnic origin, and religious beliefs.

The personal data collected might reveal:

Racial or ethnic origin

Political opinions

Religious or philosophical beliefs

Trade union membership

Genetic, biometric or data concerning health

Information regarding an individual's sex life or sexual orientation

N/A

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

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

N/A

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?*

Designated **FRA** staff members

A restricted number of staff members in the National Partnerships and Networks team in charge of the organisation of the meetings, and in Institutional Cooperation and EU Charter Unit, can access the data.

Recipients **outside** FRA:

(spectra@icfnext.com; a restricted number of personnel from the Intercontinental Hotel vienna@ihg.com, IP Travel)

ICF Next SA has access to data for the overall organisation of the event and for the submission of several communication deliverables: the hotel (Hotel Intercontinental) for booking rooms. See section 2 above.

Spectra is responsible for the registration of participants to the event via the system EU Survey which acts as sub-processor, might have access to the metadata of the respondents as well as to the answers to the responses in the registration form.

IP Travel is responsible for the organisation of travel arrangements, acting as sub-processor. IP Travel might process personal data necessary for booking transportation and related travel services.

If by any chance, the meeting will become hybrid last minute, the connection with the online participant(s) will be established via Teams.

Upon consent, name, surname, organisation and email address will be included in a separate participants list, which may be shared amongst participants and with the OECD at the end of the meeting.

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

**If yes, specify to which country:
Transfer to international organisation(s)**

Yes

No

The OECD provides FRA with the contact details the participants they wish to invite to the meeting. However, FRA does not share the contact details or other personal data from the participants with the OECD.

Upon consent from participants, FRA will only share, at the end of the meeting, the list of participants (only name, surname, organisation and email address) with the OECD.

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

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.

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. Personal data related to registration and participation will be retained by FRA for a period of 6 months after the event.

Information concerning the event on the FRA corporate website will be retained for five years.

Photographs taken during the event may be published on OECD's and FRA's social media channels and possibly FRA's and OECD's websites for communication purposes. They will remain publicly available for as long as the relevant content is maintained online. Pictures of participants taken during the event and not published will be deleted after the event.

Spectra/ICF Next will keep the registration data for no longer than the date of 18 June 2026. After that date, the data will be deleted from the system. The dietary requests and the specific access requirements (if any) will be kept for no longer than 2 weeks after the event.

For information about the retention periods of EU Survey, please consult the [privacy statement](#).

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 checked="" type="checkbox"/>
Outlook Folder(s)	<input checked="" type="checkbox"/>
CRM	<input checked="" type="checkbox"/>
Hardcopy file	<input type="checkbox"/>
Cloud (MS 365)	<input checked="" type="checkbox"/>
Servers of external provider (SPECTRA Consortium)	<input checked="" type="checkbox"/>

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 fra-civicspace@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