

*Use of Meetergo as a booking tool within the framework of a contract to develop FRA's internal and external communication strategies*

The European Union Agency for Fundamental Rights (FRA or Agency) 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 data protection 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?

We collect your data as a stakeholder identified by FRA, who will be asked to give input on FRA's internal and/or external communication activities. The data is processed by a third party contractor (Restless Communications Ltd.) under a specific contract for services concluded by FRA to develop an internal and external communication strategy. This contractor uses a scheduling tool, [Meetergo](#), that allows you to book a suitable time for your interview.

## 2. What kind of personal data do we collect?

We will collect only the following personal data necessary for the processing operation described above.

(a) General personal data:

- identification (name, surname)
- contact details (email address)
- Cookies: Meetergo uses optional cookies which do not collect any personal data. The collection of such cookies can be disabled in most web browsers. Please find information on the cookies used here: [Privacy Policy "Cookies"](#).

## 3. How do we collect your personal data?

Stakeholders will be invited by an email sent by FRA to visit the contractor's page and choose the most suitable timeslot for their interview in the meetergo booking tool integrated in their website. We collect only the personal data you provide when you fill in the booking application to schedule your interview.

## 4. Who is responsible for 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 Corporate Services Unit is responsible for this processing operation.

The Agency will use the services of Meetergo, via an agreement concluded by the Agency's contractor. The data processing and storage takes place in Germany.

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

The data processing is necessary for the performance of a task carried out in the public interest by the Agency and is part of FRA's efforts to ensure it communicates effectively as an institution, both externally and vis-à-

vis its staff. This is in line with Article 4.1.h of Regulation (EC) 168/2007, as amended by Council Regulation (EU) 2022/555 (FRA's Founding regulation). Therefore, the processing is lawful under Article 5.1.(a) of Regulation (EU) No 2018/1725.

Moreover, stakeholders are asked to give explicit consent to the processing when agreeing to the interview and making a booking. Therefore, the processing is lawful under Article 5(1)(d) of Regulation 2018/1725 insofar it is based on the consent given by the data subject.

## **6. Who can see your data?**

Only the FRA contractor with whom you book your interview and Meetego have access to your data.

## **7. Do we share your data with other organisations?**

Personal data is processed by the Agency's contractor (Restless Communications Ltd.) and its processor (Meetergo) and by the Agency through the emails sent to stakeholders containing the link to the contractor's page. 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**

No

## **9. When we will start the processing operation?**

We will start the processing operation when you book your appointment with the contractor.

## **10. How long do we keep your data?**

FRA will ensure that the contractor only keeps the personal data for the period required to fulfil the purpose for which it is collected. FRA will take the necessary steps to ensure the deletion of data by the contractor at the expiry of the specific contract signed with Restless Communication Ltd (i.e. foreseen September 2023).

## **11. How can you control your data?**

Under Regulation 2018/1725, you have rights we need to make you aware of. The rights available to you depend on our reason for processing your information. You are not required to pay any charges for exercising your rights except in cases where the requests are manifestly unfounded or excessive, in particular because of their repetitive character.

We will reply to your request without undue delay and in any event within one month of receipt of the request. That period may be extended by two further months where necessary, taking into account the complexity and number of the requests.

You can exercise your rights described below by sending an email request to [HR@fra.europa.eu](mailto:HR@fra.europa.eu).

### **11.1. The value of your consent**

Since your participation is not mandatory, we need proof that you consented to the processing of your personal data. You are asked to give explicit consent to the processing when making a booking via the website. You have the right to withdraw your consent at any time, and we will delete your data or restrict its processing. All processing operations up until the withdrawal of consent will still be lawful.

### **11.2. Your data protection rights**

#### **a. Can you access your data?**

You have the right to receive information on whether we process your personal data or not, the purposes of the processing, the categories of personal data concerned, any recipients to whom the personal data have been disclosed and their storage period. Furthermore, you can have access to such data, as well as obtain copies of your data undergoing processing.

#### **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. In your applicant account, you can modify any data provided until the call for applications closes. Once the deadline for applications has passed, certain information such as that pertaining to the admissibility and selection criteria cannot be edited and only your personal information can be modified.

#### **c. Can you restrict us from processing your data?**

You have the right to restrict the processing of your personal data. If you do, we can no longer process them, but we can still store them. In some exceptional cases, we will still be able to use them (e.g. with your consent or for legal claims). You have this right in a few different situations: when you contest the accuracy of your personal data, when the Agency no longer needs the data for completing its tasks, when the processing activity is unlawful, and finally, when you have exercised your right to object.

#### **d. Can you delete your data?**

You have the right to ask us to delete your data when the personal data are no longer necessary for the purposes for which they were collected, when you have withdrawn your consent or when the processing activity is unlawful. In certain occasions we will have to erase your data in order to comply with a legal obligation to which we are subject.

We will notify to each recipient to whom your personal data have been disclosed of any rectification or erasure of personal data or restriction of processing carried out in accordance with the above rights unless this proves impossible or involves disproportionate effort from our side.

**e. Are you entitled to data portability?**

Data portability is a right guaranteed under Regulation 1725/2018 and consists in the right to have your personal data transmitted to you or directly to another controller of your choice.

In this case, this does not apply for two reasons: I) in order for this right to be guaranteed, the processing should be based on automated means, however we do not base our processing on any automated means; II) this processing operation is carried out in the public interest, which is an exception to the right to data portability in the Regulation.

**f. Do you have the right to object?**

When the legal base of the processing is “*necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Union institution or body*” which is the case in most of our processing operations, you have the right to object to the processing. In case you object, we have to stop the processing of your personal data, unless we demonstrate a compelling reason that can override your objection.

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

Your personal data will not be used for an automated decision-making including profiling.

**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 our internal servers with limited access to a specified audience only. Access to the appointment schedule is made available only to the specified designated persons by access rights restrictions.

For this particular processing operation, FRA has not access to your data and therefore, the contractor shall ensure that adequate security measures are in place. In this regard, the scheduling tool Meetergo (see privacy policy [here](#)) secures their website and other systems through technical and organizational measures against loss, destruction, access, modification or distribution of your data by unauthorized persons. They have also implemented SSL encryption (SHA256) on their website to protect your data.

**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 [HR@fra.europa.eu](mailto:HR@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 [dpo@fra.europa.eu](mailto:dpo@fra.europa.eu).
- c) At any time you can lodge a complaint with the EDPS at <http://www.edps.europa.eu>, who will examine your request and adopt the necessary measures.

**14. How do we update our data protection notice?**

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

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