

FRA Website and Web Services Data

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 process personal data?

The purpose of the processing of personal data is to enable you to access information on FRA's website in an efficient and controlled manner while ensuring that malicious accounts are prevented from overloading the website. Personal data is collected optionally if you sign up for email alerts by creating an account on the website. If you create an account, you can decide to receive an automated monthly or weekly email with latest updates from the website as well as email notifications about project outputs. We also process personal data for testing purposes. If you decide to take part in our user testing via a webform on the website, you will help us to gain insights into how stakeholders access information on the site in order to improve the user experience. We also use some cookies to enable you to watch YouTube videos embedded on the website.

FRA records and uses personal information via the website to:

- Track whether the user has consented to the use of cookies
- Track if the user's browser supports cookies and Javascript
- Track whether the user has passed the mathematical challenge question to distinguish between human users and bots

If a user signs up for email alerts:

- To enable the user to create a user account to store their preferences for email content and frequency

If a user consents to watch a YouTube video embedded on the website:

- Cookies are set by YouTube for security, marketing, privacy and consent settings and for tracking views and behaviour

If a user requests access to documents or uses the contact form:

- To reply to the user's request or query

If a user consents to participate in an online survey or consultation:

- To provide qualitative data for research or for evaluation purposes

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

The personal data processed is covered by the following categories:

A) Cookies: cookies containing your cookie consent status, your bot checking status and YouTube cookies allowing you to watch videos

When you first visit the website, you are informed about cookies and analytics used via a banner based on the EU Commission's Cookie Consent Kit. If you decline to accept cookies, a first party cookie is set with your preference.

During periods of high web traffic, a challenge question in the form of a simple mathematical problem may be shown to determine if the user is a human or a bot. If the user solves the challenge correctly, a cookie is set recording that the challenge has been successfully solved.

In any other sections of the website requiring the use of cookies, for example viewing YouTube 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 (please refer to Youtube's [privacy policy](#) for more information).

For more details, see the FRA [Cookies page](#).

Mandatory cookies:

➤ First-party cookies

- cck1 – This cookie stores your cookie preferences (so you won't be asked again). It expires after 180 days.
- verified – This cookie records whether the user has passed the mathematical challenge question to distinguish between human users and bots. It expires after 7 days.

Optional cookies:

➤ Third-party cookies which are added when you consent to watch a YouTube video

- __Secure-YEC - This cookie is a security measure used by YouTube to detect bot traffic, mitigate spam, and prevent fraudulent ad interactions, ensuring a safe experience. The cookie expires after 30 days.
- VISITOR_INFO1_LIVE – This cookie is used to estimate your bandwidth and delivers targeted ads based on your estimated bandwidth. It expires after 180 days.
- VISITOR_PRIVACY_METADATA – This cookie is used by YouTube to store your privacy and consent settings for embedded videos. It helps ensure that your privacy choices (like consent for personalized ads or tracking) are respected when watching embedded YouTube content. It expires after 180 days.
- YSC – This cookie is used to gather viewer statistics to store and track interactions with different videos. This tracking allows YouTube to create a profile of your habits, subsequently providing video suggestions based on your viewing history and preferences.. This is a session cookie and will be deleted when you close the browser.
- __Secure-ROLLOUT-TOKEN – This cookie is used by YouTube to manage feature rollout and experimentation. It helps Google control which new features or interface changes are shown to you as part of testing and staged rollouts, ensuring consistent experience for a given user during an experiment It expires after 180 days.

B) Analytics:

The analytics tool used is Matomo, which has been recommended by various independent bodies (ULD, Germany and CNIL, France) as a privacy-compliant web analytics software. Server logbased analytics store browsing information including your anonymised IP address with 2 bytes masked on the FRA web server. The FRA website does not use cookie-based analytics but cookieless tracking. Cookieless tracking is an alternative form of tracking that uses methods such as counting the number of unique IP addresses or browser fingerprinting to identify users instead of cookies. More specifically, Matomo uses [visitor config_id](#) – a randomly-seeded, privacy-enabled, time-limited hash of a limited set of your settings and attributes to track visitors. The config_id or config hash is a string calculated per visitor based on their operating system, browser, browser plugins, IP address and browser language.

Mandatory personal data:

- Anonymised IP address

Optional personal data:

- None

C) Subscribers to e-mail alerts:

You may subscribe to FRA e-mail alerts to receive monthly or weekly updates on themes of your choice. If you subscribe to e-mail alerts you will be requested to provide your name and e-mail address when creating your user account. You may edit your data at any time or delete your data entirely by logging in to your user account and clicking the “Cancel account” button. An automated process ensures that 12 months after the registration, you have to confirm the subscription or you will be removed from the system.

Mandatory personal data:

- Username, email address, password, first name, last name

Optional personal data:

- Picture, which might reveal special categories of personal data. By uploading your picture, you consent to the incidental processing of special categories of personal data.
- Language

D) Requesting access to documents:

If you request access to documents you will be asked to submit certain personal data including name, address, and contact details as part of your application. For full details see the Information note for data subjects requesting access to documents on the [Data Protection page](#).

Mandatory personal data:

- Surname, First name, email address, postal address,

Optional personal data:

- Telephone number
- Organisation

D) Getting in touch with us via the Contact form:

If you would like to contact FRA you can use the contact form.

Mandatory personal data:

- None

Optional personal data:

- Email address
- Subject
- Message

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 [Data Protection page](#).

3. How do we collect and process your personal data?

3a. Information you provide us

Personal data you provide to contact us, request documents or keep up-to-date with FRA news as mentioned in section 2 above is collected via different forms on the website. Before submitting a form you must consent to the use of your data as explained in the relevant data protection notice.

3b. Information we collect about you

When you use our website, we use first-party cookies to store your privacy settings and prevent malicious access to the website, we store an anonymized version of your IP address, information about your visit (including how you got to our websites) and how you use our services. We may combine this information with other information you have provided to us or which we have received from other sources). If you decide to watch an embedded YouTube video, YouTube will set third-party cookies on your computer or mobile device.

3c. Information we receive from other sources

None

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 Communications & Awareness Raising Unit is responsible for this processing operation.

The data is also processed by:

- FRA's external web development contractor (Eworx S.A.) which acts as processor for software development tasks.
- FRA's hosting contractor (also Eworx S.A.) as the data is stored on secure servers in the EU
- YouTube for videos viewed in the platform (for more information, you can consult the [privacy policy](#)), as a separate controller.

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

The processing of your personal data is necessary for the management and functioning of the Agency, namely, to ensure the proper functioning of FRA's online tools. As part of its tasks, Article 4.1.(h) of FRA Founding Regulation (EC) No 168/2007 (amended by Regulation (EU) No 2022/555) states that FRA should develop a communication strategy in order to raise public awareness of fundamental rights and actively disseminate information about its work. Ensuring that the FRA's website fits the needs of its target audience contributes to the achievement of this task.

In addition, cooperation with civil society is one of the tasks assigned to the Agency in Articles 4.1(h), 10 and 15.4(l) of Regulation (EC) 168/2007, amended by Council Regulation (EU) 2022/555 establishing a European Union Agency for Fundamental Rights. One of the objectives of FRA's website is to raise public awareness of fundamental rights and actively disseminate information about its work to civil society.

Therefore, the processing is lawful under Article 5.1.(a) of the Regulation (EU) No 2018/1725.

When subscribing for email notifications, contacting us via the contact form or requesting access to documents, users provide explicit consent to the processing of their personal data via a checkbox. For the non-essential cookies users also have to provide explicit consent via the cookie consent banner or the consent on the embedded YouTube video. Therefore, the processing is lawful under Article 5.1.(d) of the Regulation (EU) No 2018/1725.

For the incidental processing of special categories of personal data revealed by pictures voluntarily uploaded by the users, explicit consent is provided by this action. Therefore, the processing is lawful under Article 10.2.(a) of the Regulation (EU) No 2018/1725.

6. Who can see your data?

Staff in the Web Team can access the FRA website as administrators. Access for administrators is covered by two-factor authentication.

Staff in the Communications and Awareness Raising unit have access to information submitted via the contact form.

Staff in the Administration unit have access to the access to documents request form.

Restricted personnel of the Agency's external web development contractor Eworx S.A might exceptionally have access to the host and usage information if required in case of technical issues.

The data is also processed by the FRA's hosting contractor, which is also Eworx S.A. The data is stored on secure servers operated by Eworx located in the EU.

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

FRA will not transfer your personal data to third countries or international organisations.

9. When will we start the processing operation?

We will start the processing operation when you browse the website or provide your data via one of our webforms. If you are registered for the email alerts, you can provide additional data in your user's profile. This additional data is not mandatory and can be modified or deleted by you at any time.

10. How long do we keep your data?

If you have created an account to subscribe for email alerts you can request deletion of your account at any time or you can delete your account yourself by logging in with your username and password.

Any request for deletion of an account will be dealt with by the Web Team within 2 weeks.

If you have not logged in to your account for more than 12 months you will be notified via email that you should log in to maintain your account and newsletter subscription. If you do not log in during a period of 2 weeks after the notification has been sent out, your account will be deleted.

If you have made a request for access to documents, your request will be deleted from the website after 183 days.

If you have contacted us via the contact form, your details will be deleted from the website the day after the form has been submitted.

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 webfeedback@fra.europa.eu.

11.1 The value of your consent

Since your submission of personal data is not mandatory, we need proof that you consented to the processing of your personal data. Consent will be collected when you submit your details via a form on the website or when you view a YouTube video. Consent to any incidental processing of special categories of personal data is given by the user who voluntarily uploads a picture to their user profile.

We store your cookie consent preferences via the cookie consent banner. For the Bot Stopper, the cookies are essential to ensure the good functioning of 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.

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. Organisational measures taken by FRA include a strict information security policy, control of access to electronically held information, data storage system, data management policy, training of FRA staff on data protection and confidentiality, data retention rules. The Agency’s technical measures comprise physical security, cybersecurity, a strict password policy, secure disposal, pseudonymisation and encryption, internet activity monitoring. In addition, FRA obliges its external contractors, acting as data processors, to apply corresponding security measures.

Website administrators must use two-factor authentication in order to access the platform.

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 dpo@fra.europa.eu.

c) At any time you can lodge a complaint with the EDPS at https://www.edps.europa.eu/data-protection/our-role-supervisor/complaints_en, 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.

END OF DOCUMENT