

Use of Microsoft Teams for FRA online meetings, events and stakeholder cooperation activities

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.

For more detailed information on the processing of your personal data in the context of use of Microsoft Office 365, please consult our [general record of processing activities](#).

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1. Why do we collect and process personal data?

The purpose of processing your personal data is to use Microsoft Teams to enable the organisation and conduct of FRA activities involving stakeholders, including:

- National Liaison Officers (NLOs)
- National Human Rights Institutions (NHRIs) and Equality Bodies
- Members of the FRA's Fundamental Rights Platform
- Experts and other participants from EU Member States and beyond

This includes the organisation of:

- Online and hybrid meetings, webinars and events
- Stakeholder cooperation and communication activities that take place online

Processing via Microsoft Teams supports:

- Communication and collaboration between FRA staff and external stakeholders
- Organisation and management of meetings and events
- Accessibility and inclusivity through digital tools

Processing activities may include:

- Registration and participation management
- Audio/video conferencing and chat functionalities
- Sharing of documents and presentations
- Use of polls (Microsoft Forms) and feedback tools
- Optional audio- and/or video- recording and AI-powered transcription, translation and live-captioning
- Follow-up communication (e.g. confirmations, reminders, event updates)

Recordings (where applicable) are used strictly for internal purposes such as minutes-taking and are not shared publicly unless explicitly stated.

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

The Agency processes your personal data to enable the functioning of the MS Teams platform. We will collect only the following personal data necessary for the respective processing operation, and the categories of data may include:

- a) General personal data:
 - Personal details: name(s), surname, country of origin, profession, organisation
 - Contact details: email address

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

Other:

- Participation related data:
 - Registration data (name, organization, email, etc.)
 - Meeting participation data (audio, video, chat, shared files, contributions in MS Forms or other tools)
 - Questions, comments, and feedback
 - Voting and/or polling (generally anonymous and requiring prior consent before contribution is submitted)
 - IP address and connection details when connecting to Microsoft Teams
 - Cookies
 - Microsoft uses necessary cookies to perform essential website functions as well as optional cookies (social media cookies, analytics cookies and advertising cookies). The latter can be rejected by participants in the web browser.
- Technical and service data:
 - Call quality and diagnostic data
 - Device and connection metadata
 - Logs related to system performance
- Content data:
 - Image portraying participants (if camera is switched on)
 - Video and voice recording in case a presentation or live question is recorded
 - Transcriptions, translations, and live-captions (AI generated)
 - Chat messages and shared materials

b) Special categories of personal data:

- If participants decide to switch on their cameras, the video might incidentally reveal personal data concerning their racial or ethnic origin, religious beliefs, or personal data concerning health, which are special categories of data. Special categories of data will also be revealed in case the content shared reveals sensitive information and/or the presentation is recorded. By switching on their cameras or willingly sharing content revealing sensitive information, participants provide their consent to the incidental processing of such data.

3. How do we collect your personal data?

3a. Information you provide us:

Personal data is collected when you:

- Register for events via Microsoft Teams
- Participate in meetings, chats, or surveys on the Microsoft Teams platform
- Communicate with FRA via email, phone calls or by filling in online information

Participants may:

- Register via Teams Forms

- Alternatively, register via email if stakeholders do not accept Microsoft terms

In order to register using the online form created by FRA, stakeholders are asked to agree to the [Microsoft Teams Event Registration Site Terms of Service](#). Please note that accepting the Events Registration site Terms of Service implies also accepting the [Microsoft Service Agreement](#) (unless overridden by any specific organization level agreements linked to the email domain participants use to register), including Microsoft [Privacy Statement](#). Participants not wishing to agree to such Terms of Service can register by sending an email to the functional mailbox of the Unit responsible for the organisation of the respective meeting, which will be communicated in the meeting invitation.

Where applicable:

- Meetings may be recorded upon consent
- AI-powered transcription, translation, and live-captioning tools may be used upon consent

For accuracy and note-taking purposes, the meetings may be audio- and/or video-recorded upon your consent. Moreover, the Agency may use the AI-powered functions of MS Teams to transcribe, translate, and live-caption the meetings, upon your consent. More information about how the tool processes your personal data can be found at [‘How Microsoft Teams uses AI to enhance audio and video in meetings’](#)

Participants can object to recording at any time. All recordings will be destroyed as indicated in section 10 below.

3b. Information we collect about you

Microsoft Teams may collect some of your device data (IP address, connection details, cookies and usage data etc.) as described in section 2 above.

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 the Unit responsible for the respective processing operation is responsible. More information will be provided in the invitation to the meeting.

Moreover, Microsoft might also process your personal data, acting as FRA’s data processor. FRA is part of the framework contract signed between the European Commission and Microsoft Ireland (processor) and therefore falls under the Microsoft ILA 2025 Data Protection Terms, which include a set of improvements specific to the data protection safeguards in place for M365.

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

FRA, as an EU Agency, carries out the tasks assigned to it by Council Regulation (EC) No 168/2007, as amended by Council Regulation (EU) 2022/555 (the Founding regulation) in the public interest. In particular, in order to engage with its stakeholders, as required in Articles 4 and 6 to 10 of the Founding Regulation,

FRA regularly organizes online meetings and events and other forms of online cooperation which require the use of a safe and reliable online platform.

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

The data subject's consent may apply in specific circumstances or for specific features, such as video-recording or the use of AI-powered features available on the Teams platform. In such cases, consent will be collected and the processing will be lawful under Article 5(1)(d) of Regulation (EU) No 2018/1725.

Moreover, the incidental processing of special categories of personal data as indicated in Section 2 above is lawful under Article 10(2)(a) of Regulation 2018/1725, as explicit consent will be given by the data subjects by switching on their cameras or willingly sharing content revealing sensitive information.

6. Who can see your data?

Access to your personal data is granted to authorised staff of FRA responsible for carrying out this processing operation (need-to-know basis).

Moreover, restricted staff of FRA's processor (Microsoft), which is bound by specific contractual clauses for any processing of personal data on behalf of FRA, and by the confidentiality obligations deriving from Regulation (EC) 2018/1725, might have access to some limited personal data.

7. Do we share your data with other organisations?

Personal data is only processed by the Agency and its processors. In case 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, FRA does not intend to transfer your personal data to Third Countries or International Organizations.

FRA is part of Microsoft ILA 2025 Data Protection Terms signed between the European Commission and Microsoft which includes a set of improvements specific to the data protection safeguards in place for M365. Personal data is stored and processed by M365 within the EU and EFTA regions (EU Data Boundary). Transfers of personal data for M365 outside the EU or EFTA got strictly limited to specific purposes such as security, resiliency, and customer-initiated actions. Any (residual) transfers to non-adequate jurisdictions are limited to a small number of countries. All transfers must follow documented instructions. It is a hypothetical possibility that Microsoft cannot exclude with the necessary level of guarantee. Microsoft 365 is included in the 'Data Privacy Framework List' and therefore, any transfer to the US is based on the [Commission Implementing Decision of 10 July 2023 on the adequate level of protection of personal data under the EU-US Data Privacy Framework](#).

9. When will we start the processing operation?

We will start the processing operation:

- Upon registration or participation in a FRA online activity, or
- Upon interaction with the Microsoft's Teams platform.

10. How long do we keep your data?

The Agency only keeps your personal data for the time necessary to fulfil the purpose of collection or further processing. The Agency maintains data for as long as the user account is activated or if users have not decided to remove or delete personal data from their account.

Microsoft as a processor for Office 365 services may retain data for Online Services upon expiration of the subscription, i.e. up to 180 days.

FRA has the following retention periods for the specified categories of data:

- Participation data: 1 year, default
- Recordings: default 120 days, but the organizer or who obtains a copy of the recording can keep it only until the purposes for which the recording was established e.g. for minute-taking, only as long as it is necessary to approve the minutes
- Technical logs: 30 days, default
- Security and audit logs: 2 years as per the requirements of CERT-EU
- User data retention after user de-activation: 90 days, data are still accessible by FRA. After that another 90 days, i.e. up to 180 days

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 the functional email of the Unit responsible for the processing activity, which will be indicated in the meeting invitation or to the Data Protection Officer of FRA at dpo@fra.europa.eu.

11.1. Do we need your consent?

Consent from the data subjects may be required in specific circumstances or for the use of specific MS Teams features, as outlined in section 5. In such cases, you have the right to withdraw your consent at any time,

and we will either delete your data or restrict or stop 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 2018/1725 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.

FRA applies:

- Technical safeguards: encryption, secure access
- Organizational measures: access control, confidentiality
- EU-compliant cloud infrastructure: Microsoft EU data centres

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 the functional email of the Unit responsible for the processing activity, which will be indicated in the meeting invitation, 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 <http://www.edps.europa.eu>, who will examine your request and adopt the necessary measures.

14. How do we update our privacy notice?

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

END OF DOCUMENT