

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

NAME OF PROCESSING OPERATION²: Event “Fundamental Rights Dialogue”, hereinafter “the Event”; taking place on 13 November 2020 in a virtual setting.

Reference number: DPR-2020-112
Creation date of this record: 20/08/2020
Last update of this record: 19/10/2020
Version: 1

Part 1 (Publicly available)

1) Controller(s)³ of data processing operation (Article 31.1(a))	
Controller: European Union Agency for Fundamental Rights (FRA) Schwarzenbergplatz 11, A-1040 Vienna, Austria Telephone: +43 1 580 30 – 0 Contact: https://fra.europa.eu/en/contact Organisational unit responsible⁴ for the processing activity: Communications and Events Unit Data Protection Officer (DPO): Robert Jan Uhl dpo@fra.europa.eu	
2) Who is actually conducting the processing? (Article 31.1(a))⁵	
The data is processed by the FRA itself	<input checked="" type="checkbox"/>
The data is processed also by a third parties (Processors)	<input checked="" type="checkbox"/>

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., which supports the registration and the logistics of the organization of the virtual event through a framework contract with DG SCIC and a specific contract with FRA.

MCI Group Contact: Anne Lesca - anne.lesca@mci-group.com

MCI Brussels Contact: Karolin Fink - gdpr-brussels@mci-group.com

[Aventri \(support@aventri.com\)](mailto:support@aventri.com)

[Youtube](#)

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).

FRA is responsible for the overall organisation of the event, the communication with the speakers and participants before and after the end of the event, as well as communication and promotion of the event.

The purpose of the processing of personal data is handling registration and attendance, identify and invite plenary speakers, reporting on the event, as well as event follow-up actions, such as sharing presentations among participants and feedback collection. It includes, in particular, lists and mailing lists for contacts, invitations, participants, reports, minutes, distribution of reports/minutes, feedback on reports, meeting follow-up, photographs/pictures, presentations, audio and/or video recording of speakers and participants, news and publications.

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

- For **participation to dialogue, a “virtual streamed session”**, pre-registration will be optional. During the pre-registration, data collected will be name, surname, age range and email address (required), and organization (optional), role (optional) and country (optional).
- For **all those recording a 1 minute video via the “online video booth”**, a dedicated consent form will provide information related to the collection, use and storage of their personal information and information. (See [template](#))

Virtual streamed session: Audio and/or video recordings are taken during the event. All those participating in the event are responsible for their interventions with their audio and video. Clear statements will be made that the session is being livestreamed and recorded before and during the session.

Those participants not intervening with audio and/or video, will also be able to use the chat function. The chat function within Zoom will be recorded and stay available for FRA. The chat and comment on the YouTube and Facebook Live streams will remain available on demand. Users can manage those comments themselves via their profile.

YouTube Chat & Comments: Those who want to engage with the Chat (Live) functionality, should be aware that using the YouTube live chat whilst being logged in with a regular Gmail

account, will mean that the user's real name will be shown. This can be changed in the display settings of your account ([direct link](#)).

For speakers of virtual videos, personal data in line with this record for processing will be collected through Video Booth Systems, in order to record and edit pre-recorded one-minute videos ([consent form](#)).

Personal data will be collected through the following means:

- during the registration process to the public session. Please note that registration to the open session will be optional.
- Active participants will connect to the web conference via the Zoom Meeting. The participants connecting to the Dialogue via Zoom Meetings, can find the [Zoom privacy statement](#) here. Any EU/EEA based person connecting to the Zoom Meeting will have their data hosted in the EEA region. See the information from Zoom regarding the AWS [Risk and Compliance whitepaper](#) and [AWS Security Center](#).
- The collection of pre-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 does not do anything with the data apart from storing it for the Contractor (MCI Benelux S.A). Event reminder emails and a post-event follow up email will be sent through Aventri ([cookie policy](#)). The only cookies that will be collected during the registration process for this event are:
 - PHPSESSID: Retains session state of a user activity (1st Party – Session Cookie)
 - Regtoken: To track cookie consent of all essential cookies (1st Party – Session Cookie)
 - selectedlanguage: Track chosen Language (1st Party – Expires in 1 day)
 - cookieconsent_status: Track cookie consent of essential cookies (1st Party – Expires in 12 months)

Neither of these cookies can read or access other cookies or any data from a user's hard drive. Further, neither of these cookies alone will personally identify a user; however, a cookie will recognize a user's individual web browser or device through an IP Address, browser version, operating system and other information.

For speakers, personal details (name, surname, country of origin (optional)) and contact details (email address, affiliated organisation) will be compiled based with their consent. During the livestream on YouTube Live, the participants' comments and feedback in the chat during the open session will be enabled. By using the live chat and/or comments functionalities, the users agrees with the [YouTube terms and conditions](#). The use of the chat/comments tool remains fully optional. by visiting the event micro-website, hosted via the web servers of one.com ([cookie policy](#)). The website uses the following first-party cookies:

Domain	Name	Value	Expires on
fra.mci-events.eu	unicodeAI.css	800x600@16	session
fra.mci-events.eu	unicodeAI.images	1032	session
fra.mci-events.eu	unicodeAI.screen	800	session
fra.mci-events.eu	unicode_privacy[conse...	%5B%5D	2021-06-09 09:50:39Z

Additionally website analytics will also be collected via Fathom, which anonymizes visitors through complex hashes. Fathom does not use cookies ([data policy](#)). Anonymised information on participation to the live streamed event (e.g. number of persons, country location, duration) will be used ([YouTube privacy policies](#)). This information will be used only for FRA internal purposes to make an evaluation of the event. Walls.io will be used to display relevant content publically available on social media channels, in order to curate an easy-to access social media wall for the Event.

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

Whose personal data are being processed?

FRA staff

Non-FRA staff (speakers, public audience, any European Citizen)

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, email address, age range (for all)

Contact details e.g. role, affiliated organisation (mandatory only for speakers and one-minute-videos):

Image, audio and/or video recordings of speakers and one-minute-videos

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 (please specify which team and Unit)

During the registration process, a restricted number of staff members, which are in charge of the event, can access your personal data. These include:

- selected staff in the Communication & events unit and its Head of Unit: Ingrid Haas, Afsheen Siddiqi, Dimitios Veremis, Miltos Pavlou and Nicole Romain
- selected staff in the Institutional Cooperation and Networks Unit (INST) and Head of Unit: Henri Nickels, Andreas Accardo
- and selected staff in Technical Assistance and Capacity Building Unit: Geraldine Guille, Sandra Aigner-Accardo, Thomas Tschernkowitsch

Designated persons **outside** FRA: (please specify)

The data processor is MCI Benelux S.A., which supports the registration and the logistics of the organisation of the virtual event through a framework contract with DG SCIC and a specific contract with FRA.

- Isabelle Deniaud, Director PCO

- Mieke Barbé, Conference Manager
- Andrea Marengo, Registration Manager
- Marion Fabre, Conference Coordinator

The livestream provider CAS AV, will receive access to speakers' information in order to setup technical rehearsal calls and to help speakers connect to the livestream.

- Nicolas Cheruy, Project Manager

The video booth supplier, Videobooth Systems Limited, will have access to the speakers name, email address, organisation and recordings.

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

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) EU-US Privacy Shield

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. Data necessary for logistics purposes (reimbursement of expenses, transport, etc.) are kept according to the rules set in the Regulation (EU, Euratom) 2018/1046.

Personal data related to registration and participation will be retained by FRA for a maximum of one year after the end of the event, which is 13 November 2021.

Photos, audio and video recordings are stored in FRA Communication and events Unit drive for three years (being considered as FRA flagship event). Within this time, the files to be used for communication purposes and/or be archived for historical purposes shall be selected. The remaining files shall be deleted.

Information concerning the event on the FRA corporate website will be retained for 10 years.

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?

- | | |
|------------------------------|-------------------------------------|
| FRA network shared drive | <input checked="" type="checkbox"/> |
| Outlook Folder(s) | <input checked="" type="checkbox"/> |
| CRM | <input type="checkbox"/> |
| Hardcopy file | <input type="checkbox"/> |
| Cloud (DMS) | <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 privacy 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

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]