

**Safeguarding Children and Young Adults online: Fieldwork research on illegal and otherwise harmful content online under the DSA**

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 it sets forth your privacy rights. We recognise that information privacy is an ongoing responsibility, and we will update this notice where necessary.

[FRANET Contractors](#) are national research entities in EU Member States that form the European Union Agency for Fundamental Rights' (FRA) multidisciplinary research network. These contractors, selected through framework contracts, provide the FRA with objective, comparable, and reliable data on fundamental rights issues within their countries. This data facilitates the FRA's comparative analyses, thematic studies, and annual Fundamental Rights Reports, covering various topics such as discrimination, access to justice, data protection, and other issues protected by the [EU Charter of Fundamental Rights](#).

For more detailed information on the processing of your personal data in the context of FRA projects within FRANET framework contracts, please consult our [General Record of processing activities](#)

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### 1. Why do we process personal data?

The purpose of the processing of personal data is to **collect data and information** for a research project titled “Safeguarding Children and Young Adults online: Fieldwork research on illegal and otherwise harmful content online under [the Digital Services Act](#) (DSA).”

This project aims to provide FRA with evidence and information on **how illegal and harmful online content targeting children and young adults is addressed at the national level in selected EU Member States** (Belgium, Bulgaria, Finland, France, Germany, Greece, Ireland, Lithuania, Malta, The Netherlands, Slovakia). The main legal framework referenced in the research is the Digital Services Act<sup>1</sup>, which protects fundamental rights online for all users, including children and young adults. The specific objectives of the research are to:

- Present an overview of illegal and harmful online content targeting children and young adults in the selected EU Member States, highlighting contents and challenges that concern (i) boys/young men and/or (ii) girls/young women
- Identify national measures that have been taken to implement the DSA to protect children online and identify persistent challenges and practical obstacles, including promising practices to address them.
- Examine and provide examples of the tension between the rights of children and young people to be protected against violence in the online sphere and other fundamental rights (access to information, freedom of expression, participation), and mitigating measures in this regard.
- Analyse the monitoring and enforcement activities taken by national authorities with respect to illegal and harmful online content targeting children/young adults, alongside remedies available to victims and other affected children and young adults.

The project (FRANET Service Request 58) consists of a mix of desk research and fieldwork. [FRANET contractors](#) will carry out interviews across the aforementioned Member States. Interviews will mainly take place face-to-face, but online interviews are also possible.

The fieldwork entails interviews with responsible stakeholders belonging to the following groups:

- **Public authorities:** DSA Coordinators (DSCs) and other competent authorities in charge of the protection of children online.
- **Law enforcement:** representatives who are responsible for investigating illegal content online.
- **Civil society:** civil society organisations that operate with different roles and responsibilities under the DSA - such as trusted flaggers, Safe Internet Centres, hotlines, helplines, Youth Councils or out-of-court dispute settlement mechanisms, and academia.
- **Online platforms whose legal representation is situated in a Member State:** namely, representatives of platforms that are aimed at or predominantly used/accessed by children and young adults.

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<sup>1</sup> [REGULATION \(EU\) 2022/2065 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 19 October 2022 on a Single Market For Digital Services and amending Directive 2000/31/EC \(Digital Services Act, DSA\)](#). For an overview of the DSA requirements, see European Commission, Questions and Answers on the DSA, available here: [Questions and answers on the Digital Services Act\\*](#)

The results of the research will inform a comparative, evidence-based publication or other output, to share experiences and good practices developed at the national level among EU Member States and EU Institutions. FRA's publications in this area will inform the implementation of current and future EU policy and laws in relation to the protection of children online, such as the DSA, the Audiovisual Media Services Directive,<sup>2</sup> the Violence against Women Directive.<sup>3</sup>

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

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

(a) General personal data:

- Personal details: name, surname, age range, gender,
- Contact details: email address and mobile number
- Only for interviewed professionals - Employment details (position/function, work experience, employer, opinions)
- Family, lifestyle and social circumstances (this type of personal data might be incidentally revealed by the responses given during the interviews and/or by the image if the interviews are carried out online and videorecorded)
- Opinions disclosed by the respondents during the interview
- Other:
  - For the interviews taking place face-to-face, the participant's voice will be processed as the interviews will be audio-recorded, for accuracy and note-taking purposes, upon consent.

*[The following information may be added or removed by the FRANET contractor, if applicable]:*

- For interviews conducted online, the participant's voice and image will be processed by the following online tool *[FRANET contractor to insert the name of the online tool]* during the audio/video recording of the interview. In addition, the online tool may gather IP addresses, cookies, metadata, or device information from the interviewee. The data protection notice of this tool is available here: *[FRANET contractor to add link to the data protection notice of the tool]*.

(b) Special categories of personal data may be inadvertently revealed during interviews (both by the responses and the images shown during online interviews):

- data revealing racial or ethnic origin.
- political opinions.
- religious or philosophical beliefs.

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<sup>2</sup> Audiovisual Media Services Directive, [Directive \(EU\) 2018/1808](#)

<sup>3</sup> [DIRECTIVE OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on combating violence against women and domestic violence](#), Directive (EU) 2024/1385

- data concerning health or sexual orientation.

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

#### *3a. Information you provide us:*

We collect your personal data listed above directly from you through a **consent form** provided to you before the interview, and during the interview using a semi-structured questionnaire. FRA's FRANET contractors will conduct the interview using a semi-structured questionnaire either face-to-face or digitally (e.g., video calls) in the selected country covered (see Section 1 above).

To ensure accuracy and facilitate effective note-taking, **interviews will be audio/video recorded with your consent. For quality control purposes, we will also ask you to give your consent for the potential automated transcription of the audio/video recordings by FRA** at a later stage.

At any point during the interview, you can indicate that **you do not wish to be recorded**, and we will stop the recording. In that case, detailed notes of the interview will be taken by the respective FRANET contractors.

The audio/video files of the interviews (both face-to-face and online) will be submitted to FRA via a secure file-sharing system and will be destroyed in accordance with Section 11.

Your name and the name of your organisation will not appear in the final FRA's report and publications. All recordings will be destroyed as indicated in Section 10 below. Your data will be completely anonymized, and it will not be possible to identify you. In case FRA wishes to report on a promising practice that you shared with us during the interviews, we will come back to you and ask for your permission to name your organization, unless it is publicly available information.

#### *3b. Information we collect about you:*

If the interviews are conducted online, your IP address, connection details, cookies, and device information may be collected, as indicated in Section 2 above. In this context, FRANET contractors are requested to inform you beforehand about which online conferencing tool they will use for the interview, as well as whether the live captions option to transcribe the interview is activated. They will also provide a link to the tool's website where its data protection policy can be found.

#### *3c. Information we receive from other sources:*

To identify the contact details of the persons to be interviewed, FRANET contractors will:

- use information gathered through the desk research component of the project (separate service request- FRANET service request No 54 "Legal and policy framework on illegal and harmful content online").
- search online for publicly available contact details,
- or obtain them from authorities of the respective EU Member State or other organisations or entities.

FRANET contractors could also acquire contact details through their own professional networks or via FRA (subject to receiving consent for sharing their contact details with the FRANET) contractors).

#### **4. Who is responsible for processing your personal data?**

The Agency acts as controller for this processing operation, which means that it is the legal entity responsible for the processing of your personal data for determining the objectives of such processing. Specifically, the Head of Justice, Digital and Migration Unit is responsible for this processing operation.

The [FRANET contractors](#) in the selected Member States will act as FRA's data processors and will collect the data on behalf of FRA as specified under section 3 above.

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

The processing operation is carried out in the public interest and it is necessary to achieve the Agency's objective, as stated in Article 2 of its founding Regulation (EC) No 168/2007, amended by Council Regulation (EU) 2022/555 (FRA's founding regulation), to provide its stakeholders, including Union institutions and EU Member States, with assistance and expertise relating to fundamental rights, including its tasks described in Article 4 (1)(a), (c) and (d). The project is also included in FRA's Single Programming Document 2025 – 2027 Fiche A.2.5., available [here](#).

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

In addition, since participation in the above-mentioned interviews is not mandatory, we will request your consent to participate by means of a consent form, for the audio/video recording of the interviews, as well as for the possible automatic transcription by FRA of the recordings of the interviews at a later stage, for accuracy and quality control purposes.

Therefore, the processing of the personal data is also in accordance with Article 5.1.(d) of Regulation (EU) No 2018/1725.

The incidental processing of special categories of data (e.g. video revealing racial/ethnic origin) is lawful under Article 10(2)(a) of Regulation 2018/1725. Explicit consent will be requested on the consent form.

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

Your data can be accessed by the designated staff of the FRANET contractors (and, in some cases, by their sub-processors) carrying out the interviews. Furthermore, the data can be accessed by staff members of FRA's Justice, Digital and Migration Unit and FRA staff working on the project. Access is restricted to authorised staff members and only these members have access rights to open the files.

FRANET contractors are bound by specific contractual clauses for any processing operations on behalf of FRA, and by the confidentiality obligations deriving from Regulation (EU) 2018/1725.

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

Personal data is processed by the Agency only. 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 Organisations?**

Your data will not be transferred to third countries or International Organisations.

**[IF APPLICABLE, TO BE ADDED OR REMOVED BY THE RESPECTIVE FRANET CONTRACTOR:** The online tool **[FRANET to insert the name of the online tool]** used for conducting the interviews is from a US-based company; therefore, it cannot be completely ruled out that limited personal data may be transferred to the US. Any such transfer, if it occurs, will be subject to the adequacy decision for the EU-US Data Privacy Framework adopted by the European Commission on 10 July 2023].

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

We will start the processing operation in October 2025.

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

The personal data referred to in Section 2 above, as well as the consent forms and audio/video recordings, will be retained for 24 months after the final date of project implementation indicated in the respective FRANET contracts, to enable the use of the data when drafting the FRA's comparative report. All data held by FRA and contractors will then be deleted. Anonymised research material, e.g. reporting templates, will be kept indefinitely.

**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: [data-digital@fra.europa.eu](mailto:data-digital@fra.europa.eu) and/or to [dpo@fra.europa.eu](mailto:dpo@fra.europa.eu) .

**11.1. Do we need your consent**

Since your participation is voluntary, we require proof that you have consented to take part in the interview as well as to the audio/video recording, and, if applicable, to the automatic transcription of the interview by

FRA at a later stage and the incidental processing of special categories of personal data. Consent will be obtained prior to the interview through a separate consent form. 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 remain valid 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 has 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 is 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 automated decision-making including profiling.

**12. What security measures are taken to safeguard your personal data?**

The Agency, as well as the eight FRANET contractors acting on its behalf as processors within this processing operation, have 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.

**13. What can you do in the event of a problem?**

- a) Data subjects can reach out directly to the Agency by sending an email to [data-digital@fra.europa.eu](mailto:data-digital@fra.europa.eu) and ask us to take action.
- b) If you obtain no reply from the Agency or if you are not satisfied with it, contact the FRA Data Protection Officer (DPO) at [dpo@fra.europa.eu](mailto:dpo@fra.europa.eu).
- c) You can lodge a complaint with the EDPS at any time 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.

**END OF DOCUMENT**