

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

FRA Diplomatic Community Event, 27 November 2024

Reference number: DPR-2020-223 (to be completed by the DPO)
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Part 1 (Publicly available)

1) Controller(s)² of data processing operation (Article 31.1(a))
<p>Controller: European Union Agency for Fundamental Rights (FRA) Schwarzenbergplatz 11, A-1040 Vienna, Austria Telephone: +43 1 580 30 – 0 Email: contact@fra.europa.eu Organisational unit responsible³ for the processing activity: Institutional Cooperation and Networks Unit Contact details: dir.office@fra.europa.eu Data Protection Officer (DPO): dpo@fra.europa.eu</p>

2) Who is actually conducting the processing? (Article 31.1(a))⁴
<p>The data is processed by the FRA itself <input checked="" type="checkbox"/></p> <p>The data is processed by FRA via LimeSurvey. <input type="checkbox"/></p> <p>The online LimeSurvey (professional online survey tool, which is hosted in the servers of the FRA webhosting contractor) will be used as registration tool to assist in collecting the information on participation</p>

¹ <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32018R1725>

² In case of more than one controller (e.g. joint FRA research), all controllers need to be listed here

³ This is the unit that decides that the processing takes place and why.

⁴ Is the FRA itself conducting the processing? Or has a provider been contracted?

3) Purpose of the processing (Article 31.1(b))

Why are the personal data being processed? Please provide a 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).

The purpose of the processing of the personal data is to organise and manage the participation of invitees to the Diplomatic Community Event taking place in the FRA premises, in Vienna, on 27 November 2024.

Participants will be contacted by email and invited to register their participation using the professional online survey tool LimeSurvey, which is hosted in the servers of the FRA webhosting contractor.

A mailing list is created using e-mail addresses provided from previous events organised by FRA (i.e. FRF, etc), from FRA day-to-day cooperation with EU institutions and IGOs, and from the consultation of the list of diplomatic services available on the website of the Ministry for Foreign affairs of Austria.

After the event, FRA will use the mailing list for follow up activities, namely sending thank you letters; dissemination of FRA's work and deliverables related to the topic of 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:

Members of the Diplomatic Community (Ambassadors and other Embassies personnels), members of EU and International organisations based in Vienna

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, gender, nationality)

Contact details (postal address, email address, mobile phone number (optional))

Education & Training details

Employment details (function, title, name and type of the employer/organisation)

Financial details (e.g. financial identification form, bank account information)

Family, lifestyle and social circumstances

Goods or services provided

Other (please give details):

- food preferences
- pictures of participants at the event, upon consent
- IP addresses and/or cookies and other metadata of participants registering online for the event may also be collected by the online tool used for registration, LimeSurvey. In this particular case, the use of cookies by LimeSurvey will be automatically disabled.

(b) Special categories of personal data (Article 10)

Participants are asked to indicate in the registration form their food preferences (for the organisation of the catering) and whether they have special accessibility requirements so the necessary accommodations can be organised. Therefore, the special categories of personal data below might be processed/revealed by the information provided in this context. Moreover, the pictures of participants taken at the event might reveal ethnic origin or racial background as well as religious beliefs.

The personal data collected reveal:

Racial or ethnic origin

Political opinions

Religious or philosophical beliefs

Trade union membership

Genetic, biometric or data concerning health

Information regarding an individual's sex life or sexual orientation

N/A

(c) Personal data relating to criminal convictions and offences (Article 11)

Criminal record (or similar, e.g. declaration of good conduct)

N/A

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 in the Director's Office and in the Institutional Cooperation and Networks Units (INST)

Recipients **outside** FRA:
(please provide a generic/functional mailbox)

7) Transfers to third countries or international organisations (Article 31.1 (e))⁵

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)

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

⁵ **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.

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 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”?

The data will be retained for a period of 6 months in order to allow for the follow up and conclusion of the event (i.e sending thank you letters, dissemination of FRA's work and deliverables related to the topic of the event).

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?

- | | |
|----------------------------------|-------------------------------------|
| Document Management System (DMS) | <input checked="" type="checkbox"/> |
| 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 (MS 356) | <input type="checkbox"/> |
| Servers of external provider | <input 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 Data Protection notice: e-mail to dir.office@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