

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

NAME OF PROCESSING OPERATION²: Workshop and Meeting on mainstreaming human rights into international organisations/institutions/donors' programmes and projects, 29-30 January 2025, in Brussels, Belgium

Reference number: DPR-2024-228
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Part 1 (Publicly available)

1) Controller(s)³ 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 responsible⁴ for the processing activity: Interinstitutional Cooperation and Networks Contact details: onEEANG@fra.europa.eu Data Protection Officer (DPO): dpo@fra.europa.eu</p>

2) Who is actually conducting the processing? (Article 31.1(a))⁵
<p>The data is processed by the FRA itself <input checked="" type="checkbox"/></p> <p>The data is processed also by a third party (contractor) <input checked="" type="checkbox"/></p>

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?

For sharing and distributing documents, the Agency uses [MS365 cloud-based services](#) on the basis of the inter-institutional framework contract.

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).

The personal data are collected and processed to allow for the proper organisation of one **workshop** and one **meeting** (hereinafter: the events) in the framework of the administrative cooperation arrangement between the FRA and the Financial Mechanism Office (FMO) of the European Economic Area (EEA) and Norway Grants (NG). The events will take place at the EFTA House, the premises of the Financial Mechanism Office of the EEA and Norway Grants, in Brussels, Belgium, on 29 and 30 January 2025. Although the events are planned and designed to take place in-person, a restricted number of participants may connect and contribute online via a link to Teams set up by the FMO.

FRA organizes these events in cooperation with the United Nations Development Programme (UNDP) and the Office of the High Commissioner of Human Rights (OHCHR).

The purpose of the processing of personal data is handling registration and attendance, reporting on the events, as well as taking appropriate event follow-up actions, such as sharing presentations among participants and feedback collection.

More specifically, FRA, as the organiser, carries out the following processing activities:

- Contacting potential participants and speakers for the events;
- Creation of mailing lists of contacts (namely participants, including the speakers);
- Handling invitation to participate and attendance;
- Correspondence with speakers, moderators and participants;
- Preparing of the programme and sessions;
- Event follow up actions such as calls, event report, minutes, distribution of reports/minutes, feedback on reports;
- Sharing the list of participants with the FMO, which is responsible for organising access to the venue and also arranging for the catering services;
- Reimbursement of accommodation and travel expenses for a limited number of participants whose costs are covered by FRA
- Sharing of presentations.

For the preparation of the events and sharing and distributing documents (prior and after the events), the Agency uses the following cloud-based services on the basis of the inter-institutional framework contract for the provision of M365 services, of which the Agency is part:

- MS Outlook
- MS Teams for preparatory meetings
- FRA DMS SharePoint to maintain FRA list of invited experts and participating experts and any other events documents such as agenda, background documents or minutes

The FMO is responsible for the activities linked to the hosting of the events at the EFTA House, for example, the entrance and reception of participants, catering services, setting up the online tool for connection to the events of a limited number of participants. They are also responsible for sending invitations to the FMO staff participating in the meeting as well as to EEA and Norway Grants donor countries representatives. The processing of personal data by the FMO to carry out such activities falls within the responsibility of the FMO and is not covered by this data protection notice.

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

Whose personal data are being processed?

FRA staff participating in the meeting

Non-FRA staff

Representatives from the Financial Mechanism Office of the EEA and NG, EEA and NG donor countries, Donor Programme Partner Institutions, International Organisations/Institutions/Donors such as: UNDP, OHCHR, Council of Europe, European Commission, European Investment Bank, European Bank for Reconstruction and Development, World Bank etc., and other institutions such as: the Danish Institute for Human Rights (DIHR), Swedish International Development Cooperation Agency (SIDA), The Norwegian Agency for Development Cooperation (NORAD), French Agency for Development (AFD) and one civil society organisation - Human Dignity.

5) Categories of personal data processed (Article 31.1(c))

Please tick all that apply and give details where appropriate

(a) **General personal data**

Personal details: name, surname

Contact details: email address

Education & Training details

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

Financial details: financial identification form, bank account information

For participants for which FRA will reimburse travel and accommodation, the following data will also be collected:

- Financial details: financial identification form and bank account information for those experts who receive reimbursement of travel/accommodation expenses
- Legal entity form: date, place and country of birth, identity document number, personal identification number
- Supporting documents (e.g. invoices, tickets, etc.)

Family, lifestyle and social circumstances

Goods or services provided

Other (please give details):

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

The personal data collected may reveal:

- | | |
|--|--------------------------|
| Racial or ethnic origin | <input type="checkbox"/> |
| Political opinions | <input type="checkbox"/> |
| Religious or philosophical beliefs | <input type="checkbox"/> |
| Trade union membership | <input type="checkbox"/> |
| Genetic, biometric or data concerning health | <input type="checkbox"/> |
| Information regarding an individual's sex life or sexual orientation | <input type="checkbox"/> |
| N/A | <input type="checkbox"/> |

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

- | | |
|--|--------------------------|
| Criminal record (or similar, e.g. declaration of good conduct) | <input type="checkbox"/> |
| N/A | <input type="checkbox"/> |

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
(From the Institutional Cooperation and Networks Unit and Administration Unit – Financial Sector)

A restricted number of FRA staff from the above Units involved in the organisation of the events has access to your personal data as described in Section 5 above.

Recipients **outside** FRA:

In case of reimbursement of costs to participants, their financial and/or legal identification forms including supporting documents are transferred to the European Commission (DG Budget) in order to validate data subjects' details in the European Union's accounting

system ABAC. Data is processed in this regard in line with FRA's data protection notice [here](#).

Staff from the FMO will have access to the list of participants to carry out the activities mentioned in section 3 above, necessary for the hosting of the events at the EFTA House.

Participants will be asked to provide their written consent to share their names, organisation and email addresses with the other participants and/or with the organisations contributing to the events.

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

Legal basis 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

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:

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.

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"?

Information and personal data collected by FRA in the context of the organisation of the events will be kept for six months after their conclusion.

Personal data relating to the Financial and Legal identification forms are kept for a maximum of 10 years after the last transaction of data related to the data subject (please refer to the relevant data protection notice for the Agency's expenditure operations [here](#)).

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 checked="" type="checkbox"/> |
| Hardcopy file | <input checked="" type="checkbox"/> |
| Cloud (MS 365) | <input checked="" type="checkbox"/> |
| Servers of external partners | <input type="checkbox"/> |

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 onEEANG@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