

**RECORD OF PROCESSING ACTIVITY  
ACCORDING TO ARTICLE 31 REGULATION 2018/1725<sup>1</sup>  
NOTIFICATION TO THE DATA PROTECTION OFFICER**

**NAME OF PROCESSING OPERATION<sup>2</sup>: Validation workshop on Remote biometric identification for law enforcement purposes, in person in Vienna on 4.6.2025**

<b>Reference number: DPR-2025-232</b> (to be completed by the DPO)
<b>Creation date of this record:</b> 26 February 2025
<b>Last update of this record:</b>
<b>Version:</b> 1

Part 1 (Publicly available)

<b>1) Controller(s)<sup>3</sup> of data processing operation (Article 31.1(a))</b>
<p><b>Controller:</b> European Union Agency for Fundamental Rights (FRA) Schwarzenbergplatz 11, A-1040 Vienna, Austria</p> <p><b>Telephone:</b> +43 1 580 30 – 0</p> <p><b>Email:</b> <a href="mailto:contact@fra.europa.eu">contact@fra.europa.eu</a></p> <p>Organisational unit <b>responsible<sup>4</sup></b> for the processing activity: Justice, Digital and Migration</p> <p><b>Contact details:</b> <a href="mailto:rbiproject@fra.europa.eu">rbiproject@fra.europa.eu</a></p> <p><b>Data Protection Officer (DPO):</b> <a href="mailto:dpo@fra.europa.eu">dpo@fra.europa.eu</a></p>

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

<sup>2</sup> **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.

<sup>3</sup> In case of more than one controller (e.g. joint FRA research), all controllers need to be listed here

<sup>4</sup> This is the unit that decides that the processing takes place and why.

## 2) Who is actually conducting the processing? (Article 31.1(a))<sup>5</sup>

The data is processed by the **FRA itself**

For email correspondence to carry out the activities that FRA undertakes in the context of the organisation of this expert meeting, FRA uses [Microsoft Office 365](#) cloud-based services. Therefore, Microsoft Ireland acts as FRA processor for this purpose.

For collecting information about the dietary/accessibility requirements of participants, FRA uses the online tool [EUSurvey](#). The data collected through the tool is stored in a secured and protected database hosted by the Data Centre of the European Commission

The contact point for all processing operations is the Agency.

## 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).*

We collect the personal data of experts invited to and participating in the validation workshop on Remote biometric identification for law enforcement purposes. The workshop takes place in Vienna at FRA on 4 June 2025 from 09:00-17:00 CEST.

The purpose of the processing of personal data is handling invitations and attendance, internal reporting on the event, as well as taking appropriate event follow-up actions, such as feedback collection.

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

- Creation of mailing lists of contacts;
- handling registration and attendance;
- correspondence with participants;
- preparation of the agenda and supporting documents;
- event follow up actions such as event report, minutes, distribution of reports/minutes, feedback on reports;
- giving access to premises, providing catering;
- reimbursement of accommodation and travel expenses.

Via email correspondence we will collect personal data to allow FRA to organize the face-to-face validation workshop and/or the payment of reimbursable costs, as communicated to the participating experts.

<sup>5</sup> Is the FRA itself conducting the processing? Or has a provider been contracted?

In order to invite participants and to organise the validation workshop, FRA will collect the personal data described in Section 5 below via FRA's professional/research networks, online searches and email correspondence with the experts. In case an invited expert cannot attend the meeting, FRA may ask the expert to suggest other experts in their organisations to be invited to the event. Experts will through email correspondence provide/confirm to FRA the information necessary for the reimbursement of their travel expenses.

Information on dietary and accessibility requirements will be collected through the EUSurvey tool to ensure the possibility for collecting explicit consent and for its timely deletion after the event.

For the preparation of the event as well as related communications related to this expert workshop FRA uses the following [Microsoft Office 365](#) cloud-based services:

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

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

*Whose personal data are being processed?*

FRA staff	<input checked="" type="checkbox"/>
Non-FRA staff (experts invited to the meeting, experts participating in the meeting)	<input checked="" type="checkbox"/>

## 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: civic title, first name, surname, gender

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Contact details:   
e-mail address, phone, mobile phone numbers (optional)

Education & Training details   
For the list of participants, FRA may collect participants' educational background.

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

Financial details   
Financial identification form and bank account information for those experts who receive reimbursement of travel/accommodation expenses (see below).

Family, lifestyle and social circumstances

Goods or services provided

Other (please give details):

For participants for whom FRA will reimburse travel and accommodation, the following data will be collected for the processing in the Commission's accounting system ABAC:

- Financial details: [financial identification form](#) (including bank account information and possibly a bank statement)
- [Legal entity form](#): date, place and country of birth, identity document number, personal identification number, address, private phone, private email, possibly business data
- A legible photocopy (recto/verso) of the identity card, passport or other identification document
- Supporting documents (e.g. invoices, tickets, etc.)

If FRA sees that an expert or their employer is already registered in ABAC, it will ask the expert to verify the accuracy of their information therein by sharing their IBAN number with FRA.

IP addresses and/or cookies and other metadata of participants informing FRA about their dietary and accessibility requirements may also be collected by the online tool used for this purpose, EUSurvey.

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

The personal data collected reveal:

- |  |                                     |
|--|-------------------------------------|
| Racial or ethnic origin                      | <input type="checkbox"/>            |
| Political opinions                           | <input type="checkbox"/>            |
| Religious or philosophical beliefs           | <input checked="" type="checkbox"/> |
| Trade union membership                       | <input type="checkbox"/>            |
| Genetic, biometric or data concerning health | <input checked="" type="checkbox"/> |

Participants may inform FRA about sensitive personal data (such as food preferences for catering offered by FRA that may reveal health information or religious beliefs, or limited information concerning health that needs to be taken into account for organising the expert meeting, e.g. special arrangements required by participants with disabilities) or reveal such data during the meeting, albeit there is no intent to process such personal data beyond the purposes indicated..

Information about dietary and accessibility requirements will be collected via the tool EUSurvey.

Information regarding an individual's sex life or sexual orientation	<input type="checkbox"/>
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N/A	<input type="checkbox"/>
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**(c) Personal data relating to criminal convictions and offences (Article 11)**

Criminal record (or similar, e.g. declaration of good conduct)	<input type="checkbox"/>
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N/A	<input checked="" type="checkbox"/>
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## 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 <b>FRA staff members</b> (Justice, Digital and Migration Unit)	<input checked="" type="checkbox"/>
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A restricted number of FRA staff responsible for organising the validation workshop has access to your personal data. A restricted number of staff in the Administration Unit (Finance Sector) has access to the financial data when the reimbursement of travel or accommodation expenses is necessary. Assigned staff from the Administration Unit (Digital Services Sector) might have access to some personal data necessary to provide technical support.

Recipients <b>outside</b> FRA:	<input checked="" type="checkbox"/>
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In case of reimbursement of costs to experts, their financial and/or legal identification forms incl. 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](#).

For the collection of information on dietary/accessibility requirements via EUSurvey, the following recipients will have access to the user data of the respondents:

- The Commission EUSurvey team for purposes of system support and maintenance
- The infrastructure administrators

For more information on the recipients of the data at the Commission, please see section 6 of FRA's [EUSurvey record of processing](#).

Moreover, restricted staff of FRA's processor (Microsoft), which is bound by specific contractual clauses for any processing operations of experts' personal data on behalf of FRA, and by the confidentiality obligations deriving from Regulation (EC) 2018/1725), might have access to some personal data as indicated in the respective data protection notice referred to above.

## 7) Transfers to third countries or international organisations (Article 31.1 (e))<sup>6</sup>

*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)

<sup>6</sup> **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.

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:

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 organization of this expert meeting will be kept for one year after the event. Sensitive personal data relating to dietary and/or access requirements will be deleted as soon as they are no longer necessary for the purpose for which they have been collected in the framework of the meeting but no later than within 1 month after the end of the meeting.

The data related to the Financial and Legal identification form is 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 [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 type="checkbox"/>            |
| Hardcopy file                    | <input type="checkbox"/>            |
| Cloud ( <a href="#">MS 365</a> ) | <input checked="" type="checkbox"/> |
| Servers of external provider     | <input checked="" type="checkbox"/> |

The data collected through the EUSurvey tool is stored in a secured and protected database hosted by the Data Centre of the European Commission. For more information, see [here](#).



## 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. To exercise your rights, please send an e-mail to [AI-Project@fra.europa.eu](mailto:AI-Project@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