

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

NAME OF PROCESSING OPERATION²: Functioning of the FRA Youth Advisory Panel Pilot

Reference number: DPR-2025-236 (to be completed by the DPO)
Creation date of this record: 12/03/2025
Last update of this record:
Version: 1

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</p> <p>Organisational unit responsible⁴ for the processing activity: Equality, Roma and Social Rights (ERSR) Unit</p> <p>Contact details: FRA-YouthAdvisoryPanel@fra.europa.eu Data Protection Officer (DPO): dpo@fra.europa.eu</p>

2) Who is actually conducting the processing? (Article 31.1(a))⁵
The data is processed by the FRA itself <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?

The data is processed by third parties

If FRA arranges the hotel and accommodation of the members of the panel, limited personal data will be processed by the respective hotel/accommodation (only name and surname). The respective hotel may require additional information from guests to provide the accommodation services, in which case, they will act as separate controllers.

Contact point at external third party N/A

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 Fundamental Rights Agency (FRA) is undertaking a pilot project to set up a Youth Advisory Panel. The panel will promote the active engagement of young people with fundamental rights in the EU and ensure that the voices of young people are heard and considered in FRA's own activities and decision-making process. The Panel will serve as an advisory function to the FRA's Director and the Units, supporting the mainstreaming of young people views and perspectives into the activities of the Agency relating to fundamental rights in the EU.

The pilot project will run for two years. Seven young people aged 18 to 25 years (born in 1999 to 2006) will engage in the panel's work and activities. In this framework, their personal data will be used and processed to organize the functioning of the Youth Advisory Panel Pilot. According to the activities foreseen in the Terms of Reference of the Panel, the personal data might be used to:

- process invitations;
- organize online and in-person meetings (among the panel members and the FRA);
- organise accommodations for the panel members;
- reimburse costs (where applicable);
- contact specific persons in case of an emergency
- exchange views and expertise;
- follow up on the discussions;
- ensure networking among the members and FRA;
- provide input to FRA's documents, to prepare relevant documents for the Panel's functioning, such as the Rules of Procedure;
- provide feedback on information and consultations;
- adhere to the Code of Conduct of the Panel and to the Communication rules of the FRA, and
- ensure the facilitation of the panel through a professional facilitator.

- communicate about the Panel on FRA's website, social media channels and other communication channels.

The processing by FRA of personal data of the selected applicants during the selection process of the Youth Advisory Panel is covered by a separate [record of processing](#). FRA will use certain personal data that the selected members of the panel provided in their applications, only as far as this is necessary for the functioning of the panel.

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

Whose personal data are being processed?

FRA staff

Non-FRA staff

Young people aged 18-25 who are members of FRA's Youth Advisory Panel
An expert contracted by FRA to ensure the smooth running of the panel.

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, date of birth, gender/ preferred personal gender pronouns, nationality(ies), citizenship, address, photo, ID copy)

Contact details (postal address, email address, phone number), emergency contact details

Education & Training details

Employment details (work experience, languages, name and type of the employer/organisation, address of the employer/ organisation)

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

Other (please give details)

Your opinions might be collected when recording online meetings.

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

Special categories of data might be processed, if revealed incidentally by the

members during the proceedings of the panel or when the processing by FRA is necessary for the organization of meetings (both online and face-to-face). This could be:

Racial or ethnic origin

Political opinions

Religious or philosophical beliefs

Trade union membership

Genetic, biometric or data concerning health

- Voice: when meeting online: but this will be stored by the Agency.
- Pictures for communication purposes on the FRA's website and social media, on voluntary basis.
- Dietary requirements, as needed for the organisation of in-person meetings.
- Video-images but not stored.
- Data concerning disability, only if necessary to arrange for special accommodations for the participation in meetings of the panel, both online and face-to-face.

Information regarding an individual's sex life or sexual orientation (if revealed)

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).*

Within FRA:

Designated FRA staff involved in the functioning of the Panel on a need-to-know basis:

- designated staff in the Equality, Roma and Social Rights Unit, on a need-to-know basis, who are administering the procedure, including the Head of Unit;
- staff dealing with financial and HR matters in the Administration Unit
- team members supporting the project from other Units of the Agency, as appointed;

the Director of the Agency and members of the Director's office.

Recipients **outside** FRA:

- External facilitator

- Hotel and other accommodation (name and surname of the Panel members).

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)

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, 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"?

FRA will keep the information related to the Pilot Youth Advisory Panel Members for a maximum of 12 months after end of membership. If physical copies containing personal data are collected, they will be destroyed too after that period.

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 type="checkbox"/> |
| Outlook Folder(s) | <input checked="" type="checkbox"/> |
| CRM | <input type="checkbox"/> |
| Hardcopy file | <input type="checkbox"/> |
| Cloud (MS 365) | <input checked="" type="checkbox"/> |
| Servers of external provider | <input type="checkbox"/> |
| Other (please specify): N/A | |

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 FRA-YouthAdvisoryPanel@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