

Events organised by FRA within its mandate of presiding the EU Justice and Home Affairs Agencies Network (JHAAN)

The European Union Agency for Fundamental Rights (FRA or Agency) processes the personal data of a natural person in compliance with [Regulation \(EU\) 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 (henceforth “the Regulation”).

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.

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1. Why do we process personal data?

The personal data are collected and processed to allow for the organisation of events within FRA's 2025 Presidency of the EU Justice and Home Affairs Agencies Network (JHAAN).

These events will be held mainly in person in Vienna and/or online. The purpose of the processing of personal data is handling invitations and attendance, internal reporting on the events/workshops, as well as taking appropriate event/workshops 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 provisional agenda and supporting documents;
- Giving access to premises, providing catering services where applicable;
- Documenting events by way of recordings and/or photographs;
- Event follow up actions such as event report, minutes, distribution of reports/minutes/presentations, feedback on reports.

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: civic title, first name, surname, gender.
- 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
- Other:

IP addresses and/or cookies and other metadata of participants may also be collected by the online tools used for registration, namely [EUSurvey](#) or [Limesurvey](#), as well as by [Microsoft](#) for online meetings conducted via Microsoft Teams.

(b) Special categories of data:

The 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 need to be taken into account for organising the events).

In addition, FRA will photograph the event for communication purposes (which may include a publication on FRA's website and social media channels) based on the participants' explicit consent. Where consent is provided, participants' images will be processed, which may also reveal some sensitive personal information.

FRA may record some events for note keeping purposes based on the explicit consent of participants. Where consent is provided, participants' voices will be processed.

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

We will collect personal data to invite participants and organise the in-person and/or online events via email correspondence and online registration tools, in line with the respective event communication to participants.

For centralizing all email communications related to this expert meeting, FRA uses [Microsoft Office 365](#) cloud-based services.

For the registration of participants, FRA uses the online tools [EUSurvey](#) and [Limesurvey](#) or email.

3a. Information you provide us

For the organisation of the event to which you are invited, FRA will collect from you the required personal data described in Section 2 above via email and an online registration tool.

You may also inform FRA about any 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 event you will attend, 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.

Subject to your explicit consent, FRA will also photograph the event for communication purposes (which may include publication on FRA's website and social media channels).

Subject to your explicit consent, FRA may record the event for note-keeping purposes.

3b. Information we receive from other sources

In order to invite participants, FRA will mainly rely on the existing contact lists put in place for the functioning of the JHAAN, to which FRA has access as Chair of the Network in 2025. In other cases, FRA may collect and process publicly available contact details of other potential participants in the respective event by searching online for their name, employer's name, function title, email address and telephone number. This information may be also obtained from FRA's professional/research networks. In case an invited participant cannot attend the meeting, FRA may ask the participant to suggest other participants in their organisations to be invited to the event.

4. Who is responsible for processing your personal data?

The Agency is the legal entity responsible for the processing of your personal data and determines the objective of this processing activity. The Head of the Institutional Cooperation and EU Charter Unit is responsible for this processing operation.

Moreover, the third parties in charge of the registration and communication tools indicated above (Microsoft for MS365, the Commission for EUSurvey and the Agency's web hosting and web development contractors for Limesurvey) might also process your personal data, acting as FRA's data processor. Please refer to the Microsoft Office 365 data protection notice [here](#), the EUSurvey data protection notice [here](#) and the Limesurvey data protection notice [here](#).

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

The processing operation is necessary for the performance of the tasks carried out by the Agency in the public interest to achieve the objectives set out in its Work Programme and are necessary for the management and functioning of the Agency. In particular, Article 6.1(a) and (b) of the FRA Founding Regulation (Council Regulation (EC) No. 168/2007 establishing a European Union Agency for Fundamental Rights as amended by Regulation (EU) 2022/555) foresees the coordination of information networks and use of existing networks as well as organization of meetings of external experts as two of FRA's working methods to carry out its activities.

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

If the processing of the special categories of personal data referred to in section 3a takes place by the data subject sharing such information with FRA, it will be lawful under Article 10(2)(a) of the same Regulation, as explicit consent will be given by the data subjects.

6. Who can see your data?

A restricted number of FRA staff responsible for organising the events can access your personal data. Designated staff from the Administration Unit (Digital Services & Facilities Sector) might have access to some personal data necessary to provide technical support.

For the registration via EUSurvey, the following recipients will have access to the user data of the respondents:

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

For the registration via Limesurvey, a restricted number of employees of Eworx S.A. (Greece), which acts as an external web development contractor, might have access to the metadata of the surveys' respondents, as well as to the answers to said surveys. Eworx is bound by specific contractual clauses for any processing operations on behalf of FRA, in accordance with Regulation (EU) 2018/1725.

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.

For more information on the recipients of the data at the Commission, Eworx S.A. and Microsoft, please see the respective data protection notices referred to above.

7. Do we share your data with other organisations?

Personal data is only processed by the Agency and its processors. 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?

We will not transfer personal data to Third Countries or International Organisations.

9. When will we start the processing operation?

We will start the processing operation in April 2025.

10. How long do we keep your data?

Information and personal data collected by FRA in the context of the organisation of an event within FRA's JHAAN Presidency will be kept for a maximum of 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. If names and organisations of participants are part of documents circulated via Ares, the [retention policy](#) of Ares will apply.

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 rbiproject@fra.europa.eu.

11.1. Do we need your consent?

The incidental processing of special categories of personal data referred to in Section 3a will be based on your explicit consent, which you provide by sharing such information with FRA.

Moreover, the recording and/or photographing of the event will be based on your explicit consent.

In that case, you have the right to withdraw your consent at any time, and we will delete your data or restrict its processing. All processing operations up until the withdrawal of consent will still be 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 have 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 request to have your data deleted?

You have the right to ask us to delete your data when the personal data is no longer necessary for the purposes for which it was 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 1725/2018 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. Will we use your data for 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 has 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. Access to the MS Teams cloud is achieved via a secure connection.

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

a) The first step is to notify the Agency by sending an email to jhaan2025@fra.europa.eu and asking us to take action.

b) The second step, if you obtain no reply from us or if you are not satisfied with it, contact our Data Protection Officer (DPO) at dpo@fra.europa.eu.

c) You can lodge a complaint with the EDPS at any time at <http://www.edps.europa.eu>, and they 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.

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