

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

<b>Reference number: DPR-2025-237</b> (to be completed by the DPO)
<b>Creation date of this record:</b> 24 March 2025
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<b>Version:</b> 1

Part 1 (Publicly available)

<b>1) Controller(s)<sup>3</sup> of data processing operation (Article 31.1(a) of Regulation (EU) 2018/1725)</b>
<b>Controller:</b> European Union Agency for Fundamental Rights (FRA) Schwarzenbergplatz 11, A-1040 Vienna, Austria <b>Telephone:</b> +43 1 580 30 – 0 <b>Email:</b> <a href="mailto:contact@fra.europa.eu">contact@fra.europa.eu</a> Organisational unit <b>responsible<sup>4</sup></b> for the processing activity: Institutional Cooperation and EU Charter Unit <b>Contact details:</b> <a href="mailto:jhaan2025@fra.europa.eu">jhaan2025@fra.europa.eu</a> <b>Data Protection Officer (DPO):</b> <a href="mailto:dpo@fra.europa.eu">dpo@fra.europa.eu</a>

<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**

The data is processed also by a **third party (contractor)**

- For email correspondence to carry out the activities that FRA undertakes in the context of the organisation of events under FRA's Presidency of the JHAAN, as well as for online events organised within the Presidency, FRA uses [Microsoft Office 365](#) cloud-based services.
- For collecting information required for the registration of participants, FRA uses the online tools [EUSurvey](#) or [LimeSurvey](#). The data collected through the EUSurvey tool is stored in a secured and protected database hosted by the Data Centre of the European Commission. Limesurvey is hosted in the servers of the Agency's webhosting contractor.

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 staff members of JHA Agencies and other experts invited to and participating in the following events organised under FRA's JHAAN Presidency:

### Horizontal meetings:

1. Trio Contact Points Coordination Meeting 1 (January 2025, online)
2. JHAAN Contact Points Meeting 1 (February 2025, Vienna)
3. Presentation of the JHAAN activities and priorities for 2025 to COSI (February 2025, Brussels)
4. Presentation of the JHAAN activities and priorities for 2025 to the LIBE Committee at the European Parliament (March 2025, Brussels)
5. Launch meeting of the JHAAN Inter-Agency Staff Visits Programme (March 2025, online)
6. Trio Contact Points Coordination Meeting 2 (May 2025, online)
7. JHAAN Contact Points Meeting 2 (June 2025, online)
8. Trio Contact Points Coordination Meeting 3 (September 2025, online)
9. JHAAN Contact Points Meeting 3 (October 2025, Vienna)
10. Heads of JHA Agencies Meeting (December 2025, Vienna)

### Working Groups (WG) meetings:

1. WG on Data Protection 1 [WG DP 1] (April 2025, Vienna and online)

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

2. JHA Security Officers Working Group 1 [JHA SOWG 1]
3. WG on ICT & Cybersecurity [WG ICT&C]
4. WG on Communication [WG on COMM] (June 2025, Vienna)
5. WG on External Relations [WG RELEX] (October 2025, Vienna)
6. JHA Security Officers Working Group 2 [JHA SOWG 2]
7. WG on Data Protection 2 [WG DP 2] (November 2025, online)

**Thematic events/workshops:**

1. Thematic workshop on Artificial Intelligence and fundamental rights (April 2025, Vienna and possibly online)
2. Thematic workshop on social media (June 2025, Vienna/hybrid)
3. Thematic event on the European Internal Security Strategy and the role of fundamental rights (September 2025, Vienna)
4. Workshop on outcome-oriented planning to achieve better impact (October 2025, Vienna)
5. Workshop on Data on gender-based violence: evidence to inform the work of JHA agencies (October 2025, Vienna)
6. Thematic workshop on foresight (November 2025, Lisbon)
7. Thematic event – Annual CharterXchange (December 2025, online)

These events will be held mainly in person in Vienna and/or online. The tentative formats and meeting locations are included in brackets above.

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.

Via email correspondence, FRA will collect personal data to allow the Agency to organise these in-person and online events.

To invite participants and to organise the events/workshops, FRA will collect the personal data described in Section 5 below mainly from 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 the data via FRA's professional/research networks, online searches, email correspondence with the participants and/or online surveys. 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. Registration information will be collected through the EUSurvey or LimeSurvey tools or by email.

For the preparation of the events, related communications and hosting of online events, FRA uses the following [Microsoft Office 365](#) cloud-based services:

- MS Outlook
- MS Teams
- FRA's document management system 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 (participants invited to/joining the events)	<input checked="" type="checkbox"/>

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

*Please tick all that apply and give details where appropriate*

<b>(a) General personal data</b>	
Personal details: civic title, first name, surname, gender	<input checked="" type="checkbox"/>
Contact details: e-mail address, phone, mobile phone numbers (optional)	<input checked="" type="checkbox"/>
Education & Training details For the list of participants, FRA may collect participants' educational background.	<input checked="" type="checkbox"/>
Employment details (function/title, name, and type of the employer/organisation, where applicable)	<input checked="" type="checkbox"/>
Financial details	<input type="checkbox"/>
Family, lifestyle and social circumstances	<input type="checkbox"/>
Goods or services provided	<input type="checkbox"/>
Other (please give details):	<input checked="" type="checkbox"/>

IP addresses and/or cookies and other metadata of participants may also be collected by the online tools used for registration, EUSurvey and LimeSurvey, as well as by Microsoft for online meetings conducted via Microsoft Teams.

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

The personal data collected reveal:

- |   |                                     |
|---|-------------------------------------|
| Racial or ethnic origin   | <input checked="" 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<br>(e.g. food restrictions where applicable) | <input checked="" type="checkbox"/> |
| Information regarding an individual's sex life or sexual orientation                      | <input type="checkbox"/>            |
| N/A   | <input 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 above.

Information about dietary and accessibility requirements might be collected via the online registration tools, EUSurvey or LimeSurvey.

In addition, FRA may 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 before the event. Where consent is provided, participants' voice might be processed.

**(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 checked="" 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 <b>FRA staff members</b> | <input checked="" type="checkbox"/> |
|-------------------------------------|-------------------------------------|

A restricted number of FRA staff responsible for organising the events has access to the personal data of participants. Assigned staff from the Administration Unit (Digital

Services Sector) might have access to some personal data necessary to provide technical support.

Recipients **outside** FRA:

For the registration 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](#).

For the registration via Limesurvey, some of employees 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 (see section 6 of FRA's [Limesurvey record of processing](#)).

Moreover, restricted staff of FRA's processor (Microsoft), which is bound by specific contractual clauses for any processing operations of participants' personal data on behalf of FRA, and by the confidentiality obligations deriving from Regulation (EC) 2018/1725), might have access to some personal data (see section 6 of FRA's [M365 record of processing](#)).

## 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:**

<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.

**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 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 organisation of the JHAAN Presidency events in 2025 will be kept for a maximum of one year after the respective 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 respective event but no later than within 1 month after the end of the event. If names and organisations of participants are part of documents circulated via Ares, the [retention policy](#) of Ares will apply.

### 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"/>
Ares	<input checked="" type="checkbox"/>
FRA network shared drive	<input checked="" type="checkbox"/>
MS 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](#). The data collected through Limesurvey is stored on the servers of FRA's webhosting contractor Mainstrat, which, in accordance with the data protection clauses included in the contract signed with FRA, has in place technical and security measures as required under Regulation (EU) 2018/1725.



## 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