

From Data to Change: Insights into the Situation of Roma in Bulgaria from the FRA Roma Survey event, on 8 December 2025, in Sofia, Bulgaria.

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

This data protection notice explains FRA's policies and practices regarding its collection and use of your personal data and sets forth your privacy rights. We recognise that information privacy is an ongoing responsibility, and we will update this notice where necessary.

1. [Why do we process personal data?](#)
2. [What kind of personal data does the Agency process?](#)
3. [How do we process your personal data?](#)
4. [Who is responsible for processing your personal data?](#)
5. [What is the legal basis for this processing operation?](#)
6. [Who can see your data?](#)
7. [Do we share your data with other organisations?](#)
8. [Do we intend to transfer your personal data to Third Countries/International Organizations?](#)
9. [When will we start the processing operation?](#)
10. [How long do we keep your data?](#)
11. [How can you control your data?](#)
 - 11.1. [Do we need your consent?](#)
 - 11.2. [Your data protection rights](#)
12. [What security measures are taken to safeguard your personal data?](#)
13. [What can you do in the event of a problem?](#)
14. [How do we update our data protection notice?](#)

1. Why do we process personal data?

The purpose of the processing of your personal data is the organisation of the **From Data to Change: Insights into the Situation of Roma in Bulgaria from the FRA Roma Survey event**, on 8 December 2025 in Sofia, Bulgaria, at the House of Europe premises (hereinafter: the event).

The processing activities include sending out invitations to participants, handling registration and attendance, reimbursing the cost of travel and/or accommodation of selected participants, granting access to the venue and related facilities and technical support, the organisation of the catering during the events, the interpretation from Bulgarian to English and vice versa, printing event documentations, reporting on the event, as well as event follow-up actions, such as sharing presentations among participants and feedback collection. It includes, in particular, mailing lists for contacts, distribution of reports/minutes, event follow-up, and written notes of the events for the purpose of minutes taking and reporting.

FRA is responsible for the overall organisation of the event and communication with the participants before and after the end of the event. The processor (see details under section 4) is responsible for the organisation of the event in accordance with the services contract concluded with FRA, including the overall coordination under the supervision of FRA, the event rundown, including engaging with the speakers and moderator, the logistical work and additional equipment necessary for hosting the event.

FRA's processor (the Center for the Study of Democracy (CSD), see details under section 4) will have download participants' personal data submitted via the EU Survey registration form for the purpose of completing the above outlined responsibilities pertaining to the organisation and follow up of the event from FRA. Information concerning their travel and accommodation is therefore directly received and processed by the contractor, who will contact directly only those participants that have explicitly indicated the need for travel and accommodation support to attend the event.

Since the event is to take place at the House of Europe, home of the Representation of the European Commission and the Bureau of the European Parliament in Bulgaria, they will receive the name and surname of participants to grant them access at their premises.

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: first name, last name, position in the job, organisation.
 - Contact details: e-mail address
- Other:

- For participants for whom travel and accommodation is reimbursed, the following information indicated in the supporting evidence will be processed for the purposes of reimbursement:

- City of departure and return
 - Means of transport
 - Date and time of departure to Sofia
 - Date and time of return from Sofia
 - Bank account number for reimbursement purposes
-
- Pictures of participants, speakers and moderators taken during the event, upon consent. The image of participants, speakers and moderators might reveal racial or ethnic origin, and religious beliefs.
 - EUSurvey uses the Europa Analytics service for traffic statistics and analytics. For further information see the [Europa Analytics](#) website, where information can be found about the cookies and IP address collected by the European Commission website, as well as its [cookies policy](#).

(b) Special categories of personal data:

Data concerning health and/or religious beliefs, such as dietary requirements and accessibility, necessary for the organisation of the catering services, and the full participation during the event, and access to the venue may be collected from participants, upon consent, if they have previously declared in the registration form that they have such special requirements.

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

Participants will be invited to register to the Event via email sent by CSD, FRA's processor (see section 4 for details) on the basis of the list provided to them by FRA as indicated in 3c below.

3a. Information you provide us

We collect the data you provide us with in the registration form and during the participation in the event (see point 2 of this document).

Upon consent, CSD will take pictures of participants during the round table and will share them with FRA, which in turn may share them via its website and/or social media accounts.

Upon participants' consent, CSD will provide the list of participants to the venue operator for the purposes of granting access to the venue and organising the event.

Information about participants who have agreed, through an opt-in functionality in the registration form, to receive via email FRA's information regarding Roma and Sinti new findings, events, and upcoming surveys will be included on the list of stakeholders on Roma in FRA's CRM database.

From those participants indicating in the registration form that they have special dietary and accessibility requirements, the processor will contact them directly by email and collect, upon their consent, the details of such requirements, for the purposes of organising the catering services and access to the venue

3b. Information we collect about you

The registration of participants is managed by FRA's contractor CSD via the EU Survey registration software. Participants are invited to register by FRA's contractor, which has received the list of invitees from FRA.

The EU Survey registration tool might collect IP addresses, cookies and other metadata as specified in section 2. More information about EU Survey registration tool can be found in its [privacy statement](#).

3c. Information we receive from other sources

FRA has obtained the contact details of participants from the FRA stakeholders contact list, thanks to their confirmation to be informed of FRA events and communications. For a few invitees, contact details were available publicly on the web.

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.

The Center for the Study of Democracy (CSD), 5 Alexander Zhendov St.1113 Sofia, Bulgaria, supports FRA in the organisation of this event, acting as data processor. A contract between FRA and CSD has been signed for this purpose.

The Representation of the European Commission in Bulgaria is the venue operator and may process the names of participants for the purposes of granting access to venue (House of Europe).

For more information about the entities in the European Commission responsible for EUSurvey consult [EUSurvey privacy statement](#).

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

The processing of personal data linked to the organisation, management and follow-up of the event is necessary on occasion of the consultation event on **From Data to Change: Insights into the Situation of Roma in Bulgaria from the FRA Roma Survey**. In this particular case, the legal base can be found in Articles 4 of the FRA [Founding Regulation \(EC\) No. 168/2007](#), as amended by [Regulation \(EU\) 2022/555](#) (the amended Founding Regulation), and in project A.3.2 Additional activities under the sector 'Roma inclusion' of the FRA [Single Programming Document 2025-2027](#), p. 36.

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

The transfer of the list of participants to the venue operator (processor) for the purposes of granting access to the venue is based on the consent provided in the registration form. Moreover, CSD may take pictures of participants during the event, which will be shared amongst participants and with FRA for dissemination via its social media accounts, upon participants' consent. Consent will also be requested to be included in a FRA mailing list (CRM) to receive via email FRA information regarding Roma and Sinti new findings.

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

The processing of the special categories of personal data mentioned in section 2 (such as dietary and accessibility requirements) is lawful under Article 10(2)(a) of the same Regulation as the data subjects give explicit consent to it.

5. Who can see your data?

Access to your data is granted to authorised staff of FRA's processor CSD. The processor is bound by confidentiality and data protection clauses. FRA will have access to some personal data from CSD. Additionally, the venue operator will have access to the list of participants for the purpose of granting access to the venue.

This is without prejudice to a possible transmission to the bodies in charge of a monitoring or inspection task in accordance with Union legislation. Neither FRA nor its service providers share personal data with third parties for direct marketing.

For more information about who in the European Commission may have limited access to your data when submitting your registration form, please consult [EUSurvey privacy statement](#), may have limited access to your data when submitting your registration form.

6. 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.

7. Do we intend to transfer your personal data to Third Countries/International Organisations

No.

8. When will we start the processing operation?

We will start the processing operation in November 2025.

9. How long do we keep your data?

Personal data will be kept after the event to ensure implementing necessarily follow up activities with regard to the purpose(s) of the processing of personal data as well as for its related management. Personal data related to registration and participation will be retained by the processor for a period of 6 months after the event for the purpose of reporting and the implementation of related follow up activities.

Information (including pictures) concerning the event on the FRA corporate website and social media accounts will be retained for five years according to FRA's data protection policy. Pictures of participants taken during the event and not published will be deleted after the event.

CSD will keep the registration data for no longer than the date of 31 December 2025. After that date, the registration data will be deleted. The dietary requests and the specific access requirements (if any) will be kept for no longer than 1 week after the event.

For information about the retention periods of EUSurvey, please consult the [privacy statement](#).

10. 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 nat.partnerships@fra.europa.eu.

11.1 Do we need your consent?

Since your participation is not mandatory, we need proof that you consented to the transfer of your data to the venue operator for the purposes of granting access to the venue. We also need proof that you opt-in for the event's photographer to take pictures in which you might appear and share them amongst participants and with FRA to share them via social media accounts. We also need your consent to be included in a FRA mailing list (CRM) to receive via email FRA information regarding Roma and Sinti new findings, etc. These consents can be given or not via the registration form.

From those participants indicating in the registration form that they have special dietary and accessibility requirements, we need your consent that the processor will contact them directly by email and collect, the details of such requirements, for the purposes of organising the catering services and access to the venue.

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 delete your data?

You have the right to ask us to delete your data when the personal data are no longer necessary for the purposes for which they were 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 2018/1725 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. Do we do automated decision making, including profiling?

Your personal data will not be used for an automated decision-making including profiling.

11. 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.

All data related to the participants in the Event are kept in a protected server. Access is restricted and limited to dedicated staff members in the National Partnerships and Networks team, and in the Institutional cooperation and EU Charter Unit.

FRA has concluded a contract with CSD which includes dedicated data protection clauses as well as the obligation to adopt appropriate technical and organisational security measures when processing personal data.

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

a) The first step is to notify the Agency by sending an email to nat.partnerships@fra.europa.eu and ask 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) At any time you can lodge a complaint with the EDPS at <http://www.edps.europa.eu>, who will examine your request and adopt the necessary measures.

13. 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.

END OF DOCUMENT