

**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>: Stakeholder consultation for an independent review and scenario development of the European Union Agency for Fundamental Rights' population-based surveys**

Reference number: DPR-2025-252 (to be completed by the DPO)
Creation date of this record: 10 December 2025
Last update of this record:
Version: 1

**Part 1 (Publicly available)**

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

<b>2) Who is actually conducting the processing? (Article 31.1(a))<sup>5</sup></b>
<p>The data is processed by the FRA itself <input checked="" type="checkbox"/></p> <p>The data is processed also by a third party <input checked="" type="checkbox"/></p> <p>The following third parties might be involved as processors:</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.

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

The consortium led by Tetra Tech International Development SP. ZO.O, with which FRA has signed a specific contract under the inter-institutional FWC EC-JUST/2024/OP/001. For this contract, the processing activities will be carried by the consortium partners Asterisk Research & Analysis.

Address and contact point processors:

ul. Krucza 16/22,

00-526 Warszawa, Poland

Email: [DGJUSTEvaluation@tetratech.com](mailto:DGJUSTEvaluation@tetratech.com)

For the online questionnaire, FRA contractor will use EUSurvey:

EUSurvey is the European Commission's multilingual online survey management system built for the creation and publication of surveys and public consultations. The data is collected and stored in a secured and protected database hosted by the Data Centre of the European Commission.

The European Commission (DIGIT) is processor for the:

- web-based interface for the survey owner and the contributors
- hosting of the survey data and any submitted responses.

In cases EU Login is used, the European Commission (DIGIT) is the controller for all processing operations related to keeping an EU Login account and to the authentication itself. For more information, please refer to: [EU Login Privacy Statement](#). The EC-DIGIT is responsible for the processing of personal data collected and processed for traffic statistics and analytics via Europa Analytics, the corporate service that monitors and evaluates the effectiveness and efficiency of the EC's websites on Europa. For more information, please consult the record on [EUSurvey](#) maintained by the Commission, the related [data protection notice](#) and the [Help for authors webpage](#).

For conducting interviews, as well as audio recording and automatic transcription using AI, Microsoft Teams will be used.

### 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).*

The purpose of the processing of personal data is to carry out the “*Independent review and scenario development of the European Union Agency for Fundamental Rights’ population-based surveys*”. The objective of this project is to undertake an **independent and thorough review** of FRA’s large-scale surveys

- in terms of content, survey design, and required financial and human resources;
- by considering their impact on legislation and policy, emerging fundamental rights concerns, and potential shifts in policy priorities, as well as the changing realities of survey research.

The critical review should result in a **set of proposals for scenarios with different options** regarding FRA surveys. The scenarios are expected to enable sustainable long-term survey planning, duly consider necessary operational budget and human resources, survey methodology, timing and quality, as well as external conditions that

may have an impact on regular data collection – including, for example, changing policy priorities at the level of the EU, or data collection using other means or by different actors; allow for a flexible prioritisation of different surveys.

FRA has contracted the services of the consortium led by Tetra Tech (acting as processor) to conduct the study, which includes a stakeholder consultation encompassing the following processing activities:

- Semi-structured interviews
- Group interviews
- Online questionnaire

To carry out its tasks under the contract, FRA will provide the processor with contact details (name, organisation, function, email) of its key stakeholders. On that basis and based upon own research the processor will set up a list of stakeholders (name, organisation, function, email) with potential for being selected for in-depth interviews. The interviewees will be contacted by email by Tetra tech with information about the study and the data protection notice. For further contact administration, telephone numbers might be collected. Interviews will be conducted online, via [MS Teams](#). Upon consent of the interviewees, the interviews might be audio-recorded and/or automatically transcribed, [using the AI powered feature available](#) in the meeting platform, for the purpose of note taking.

FRA will not have access to the personal data of any of the interviewees and will receive the responses in an anonymised form.

Moreover, online consultations will be conducted by the processor using the online survey tool EUSurvey. The survey is anonymous. Name and email addresses are used to administer the survey and are not used for linkage or analysis with the survey responses. The responses will be shared with FRA in an anonymised way and not published.

The processor will collect optionally email addresses through the EU survey for follow up activities.

EUSurvey provides support for either identification of respondents or anonymity, depending on survey requirements. In any case, surveys are always managed confidentially, even when they are not anonymous.

The creation and management of the survey on EUSurvey requires login via EULogin.

For further information on the processing of personal data by EULogin and the EUSurvey tool, please refer to the dedicated processing operations:

- Commission’s EU Survey [record of processing](#) and [data protection notice](#)
- [EU Login data protection notice](#).

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

*Whose personal data are being processed?*

- |                                                                                                                                                |                                     |
|------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------|
| FRA staff (as respondents when FRA staff is consulted)                                                                                         | <input checked="" type="checkbox"/> |
| Non-FRA staff (FRA stakeholders, like Equality Bodies, National Human Rights experts, academia, INGOS, EU authorities, partner organisations.) | <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 (add or delete as appropriate – the data in the brackets are only examples)

- |                                                                                  |                                     |
|----------------------------------------------------------------------------------|-------------------------------------|
| Personal details (name, surname)                                                 | <input checked="" type="checkbox"/> |
| Contact details (email address phone number)                                     | <input checked="" type="checkbox"/> |
| Education & Training details                                                     | <input type="checkbox"/>            |
| Employment details (function, name and type of the employer/organisation)        | <input checked="" type="checkbox"/> |
| Financial details (e.g. financial identification form, bank account information) | <input type="checkbox"/>            |
| Family, lifestyle and social circumstances                                       | <input type="checkbox"/>            |
| Goods or services provided                                                       | <input type="checkbox"/>            |
| Other (responses to online survey and <b>expert</b> interviews):                 | <input checked="" type="checkbox"/> |

Responses provided by the interviewees and/or stakeholders consulted

As the interviews may be audio recorded and processed by the function of automatic transcription that the Microsoft Teams platform offers as an AI powered feature (upon consent) for accuracy and note-taking purposes, voice and/or image of the participant may be processed

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](#).

By switching on the camera you agree to processing of your image that can incidentally reveal personal data such as racial or ethnic origin or religious beliefs.

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

Although there is no intention to process special categories of personal data, the personal data collected via the (audio) recording of the interview might incidentally reveal the special categories of data below:

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	<input checked="" type="checkbox"/>
Information regarding an individual's sex life or sexual orientation	<input type="checkbox"/>
N/A	<input type="checkbox"/>
<b>(c) Personal data relating to criminal convictions and offences (Article 11)</b>	
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 **FRA** staff members  
(please specify which team and Unit-no need to mention specifically the names of colleagues)

*Restricted number of FRA staff involved in the study Independent review and scenario development of the European Union Agency for Fundamental Rights' population-based surveys will have access to the anonymised responses of the interviews and the online survey.*

Recipients **outside** FRA:  
(please provide a generic/functional mailbox)   
*Members of contractors' teams involved in the study Independent review and scenario development of the European Union Agency for Fundamental Rights' population-based surveys*  
Email: [DGJUSTEvaluation@tetrattech.com](mailto:DGJUSTEvaluation@tetrattech.com)

#### 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

<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.

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 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"?*

Personal data received from FRA and collected during the stakeholder consultation will be kept by the processor until the study is finalized by 31 December 2026.

List of contacts provided by the processor will be kept by FRA for potential follow up activities beyond the duration of the contract until 31 December 2027. Anonymised responses will be kept indefinite.

### 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 type="checkbox"/>
CRM	<input type="checkbox"/>
Hardcopy file	<input type="checkbox"/>
Cloud (MS 365)	<input checked="" type="checkbox"/>
Servers of external provider	<input checked="" type="checkbox"/>

The data is stored in the contractor's server and the EU survey system.

## 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 [DGJUSTEvaluation@tetrattech.com](mailto:DGJUSTEvaluation@tetrattech.com) or [surveyreview@fra.europa.eu](mailto:surveyreview@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