

*Meetings of the Survey Review Steering Committee*

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.

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## 1. Why do we process personal data?

The purpose of the processing is the organisation of online, hybrid and in-person meetings (or workshops) of the Survey Review Steering Committee (the Steering Committee), established by FRA to follow and provide feedback on the work FRA has contracted as part of a survey review and scenario development exercise that sets out to examine whether and how FRA surveys are 'fit for purpose' and 'future proof'.

The processing activities for the organisation of the meetings include handling invitations and attendance, internal reporting on the event, as well as taking appropriate event follow-up actions, such as feedback collection.

More specifically, FRA, as the organiser, may carry out some or all of the following processing activities:

- collection of contact details, provided by members upon their nomination to the Survey Review Steering Committee
- handling registration and attendance;
- correspondence with participants;
- preparation of the agenda and supporting documents;
- event follow up actions such as event report, minutes, distribution of reports/minutes, feedback on reports;
- for in person meetings/workshops:
  - giving access to premises;
  - reimbursement of accommodation, daily allowance and travel expenses.
- for online or hybrid meetings: sending out Teams invitations with access to the online meetings

## 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
- Financial details: financial identification form and bank account information for participants who receive reimbursement of travel/accommodation/daily allowance expenses (see below).

For participants for whom FRA will reimburse travel, daily allowance and accommodation, the following data will be collected for the processing of the payments in SUMMA<sup>1</sup>:

- [Business partners](#) – legal entities and bank accounts identification form, accompanied by a legible copy of the identity document and/or extracts of the bank account;
- Supporting documents (e.g. invoices, tickets, etc.)

If FRA sees that an expert or their employer is already registered in SUMMA, it will ask the expert to verify the accuracy of their information therein by sharing their IBAN number with FRA. For more details on the processing of personal data for the registration of business partners in SUMMA, refer to the [data protection notice of the European Commission](#).

➤ Other:

For online/hybrid meetings in Teams:

- Questions, comments, and messages via chat (only for the purpose of minutes taking)
- Voting and/or polling (if applicable)
- IP address and connection details, name, surname, country of origin, profession, organisation and email when connecting to Microsoft Teams platform. Please refer to the [Microsoft 365 data protection notice](#).

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

Upon their nomination to the Survey Review Steering Committee, members provide FRA with their contact details.

Via email correspondence we will collect personal data to invite participants and organize meetings and/or the payment of reimbursable costs, as communicated to participants.

#### 3a. Information you provide us

For the organization of the meetings, FRA will collect from you the personal data described in Section 2 above via email. Through email correspondence you will provide FRA with information allowing us to reimburse your travel and accommodation expenses, in case of in-person meetings.

For centralizing all email communications related to the meetings, FRA uses Microsoft Office 365 cloud-based services.

#### 3b. Information we receive from other sources

N/A

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<sup>1</sup> Accounting system of the European Commission

#### **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 Justice, Digital and Migration is responsible for this processing operation.

Moreover, the third parties indicated above (Microsoft) might also process your personal data, acting as FRA's data processor. Please refer to the Microsoft Office 365 data protection notice [here](#). FRA is part of the framework contract signed between the European Commission and Microsoft Ireland (processor) and therefore falls under the Microsoft ILA 2025 Data Protection Terms, which include a set of improvements specific to the data protection safeguards in place for M365.

#### **5. Which 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(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 organization of meetings of external experts as one of FRA's working methods to carry out its activities. Moreover, the activity is foreseen in action 'K.4.1 Internal report – Survey review' of the FRA Single Programming Document 2026-2028, p. 60.

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

In addition, the processing of financial and bank account information in order to reimburse travel and accommodation expenses is necessary to comply with Regulation (EU, Euratom) 2024/2509 of the European Parliament and of the Council of 23 September 2024 on the financial rules applicable to the general budget of the Union (recast).

Therefore, the processing operation is lawful in accordance with Article 5.1.(b) of Regulation (EU) 2018/1725.

#### **6. Who can see your data?**

A restricted number of FRA staff responsible for organising the meetings/workshops can access your personal data. A restricted number of staff in the Administration Unit (Finance Sector) can access the financial data when the reimbursement of travel or accommodation expenses is necessary (for in-person meetings). Assigned staff from the Administration Unit (Digital Services Sector) might have access to some personal data necessary to provide technical support.

In case of reimbursement of costs to experts, their financial and/or legal identification forms including supporting documents are transferred to the European Commission (DG Budget) in order to validate data subjects' details in the European Union's accounting system SUMMA. Data is processed in this regard in line with the data protection notice [here](#).

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 as indicated in the respective data protection notice 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 February 2026.

#### **10. How long do we keep your data?**

Information and personal data collected by FRA in the context of the organization of meetings of the Steering Committee will be kept for one year after the event.

The data related to the business partners (legal entities and bank account) form is kept for a maximum of 10 years after the last transaction of data related to the data subject (please refer to the relevant data protection notice [here](#)).

#### **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 [surveyreview@fra.europa.eu](mailto:surveyreview@fra.europa.eu).

##### **i. Do we need your consent?**

Since your participation in the meeting is not mandatory, you voluntarily provide FRA with the personal data necessary for organizing the meeting. 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.

ii. **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:

1) 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 [surveyreview@fra.europa.eu](mailto:surveyreview@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](mailto: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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