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EUROPEAN UNION AGENCY FOR FUNDAMENTAL RIGHTS

DATA PROTECTION NOTICE

"Operationalising National Independent Monitoring Mechanisms under the Pact on Migration and Asylum – Effective monitoring and investigations", expert meeting organised by the EU Agency for Fundamental Rights (FRA), on 9-10 November 2026, in Vienna, Austria.

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 of your personal data is the organisation of the expert meeting "Operationalising National Independent Monitoring Mechanisms under the Pact on Migration and Asylum – Effective monitoring and investigations", that will take place in Vienna at the FRA premises on 9 and 10 November 2026 (hereinafter: the event).

The event brings together the national Independent Monitoring Mechanisms (IMMs) that Member States are required to establish or appoint under Article 10 of the Screening Regulation and Article 43(4) of the Asylum Procedure Regulation, together with other relevant national and European actors. It follows up on the online meeting of 11 June 2026, which mapped the current status, needs and challenges of the IMMs.

The event is organised by FRA with substantive inputs from the Frontex Fundamental Rights Officer, the European Network of National Human Rights Institutions (ENNHRI) and the Council of Europe. FRA and these three organisations will moderate the sessions and share their expertise during the discussions. FRA alone carries out the organisation of the event, including the invitations, the registration, the access to the venue and the catering.

The processing activities include sending out invitations to participants, handling registration and attendance, granting access to the venue, taking photographs during the event for communication purposes, the organisation of the catering during the event at FRA premises and of a dinner at an external venue on 9 November 2026, reimbursing travel and accommodation expenses for the representatives of the national Independent Monitoring Mechanisms, reporting on the event, as well as event follow-up actions, such as sharing presentations among participants and feedback collection. It includes, in particular, the creation and management of participant lists and mailing lists, distribution of documents and meeting follow-up. FRA is responsible for the overall organisation of the event and for the communication with the participants before, during and after the meeting.

Upon your consent, a participant list, including name, surname, contact details, function/job title, name and type of the employer/organisation will be compiled and shared with the Frontex Fundamental Rights Officer, ENNHRI, the Council of Europe, other participants, and other relevant bodies included in the functioning of the IMM.

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:** Title, first name, surname, country of residence.
- **Contact details:** e-mail address, mobile telephone number.

- **Employment details:** function/job title, name and type of the employer/organisation.
- **Speakers and moderators:** photograph and short biography, for inclusion in the agenda of the meeting. The agenda, including this information, is shared with the participants and with the Frontex Fundamental Rights Officer, ENNHRI and the Council of Europe.
- **Financial details for reimbursement purposes:** for the participants who receive reimbursement of travel and accommodation expenses, FRA will organise the reimbursement in accordance with the applicable European Commission's rules. For the processing of payments in SUMMA, (see the related data protection notice), the following information will be requested/collected:
    - Business partners – date, place and country of birth, address, e-mail, identity document number, personal identification number, banking details (including bank account information and possibly a bank statement), possibly business data; a legible photocopy (recto/verso) of an identity card, passport or other identification document;
    - Supporting documents (e.g. invoices, tickets, boarding passes).
    - If participants or their employer are already registered in SUMMA, FRA will ask the participant to verify the accuracy of their information therein by sharing their IBAN number and date of birth with FRA.
- **Other:**
    - Registration for the event is handled through EUSurvey, administered by FRA. EUSurvey uses Europa Analytics for traffic statistics and analytics, and may collect IP addresses, technically necessary and security cookies and metadata such as the response timestamp. For more information, please consult the EUSurvey privacy statement.
    - At the end of the event, FRA will collect anonymous feedback from participants through a satisfaction survey run in EUSurvey. IP tracking is switched off for this survey, so the answers cannot be linked to individual participants and no personal data is collected through it.
    - The meeting is an in-person meeting. However, should a speaker or a participant be unable to travel, one or more speakers or participants could be connected on a video link (Microsoft Teams), in which case the meeting would become hybrid. In case a speaker/participant attends via Microsoft Teams, the following information may be collected:
        - Name, surname, email, profession and organisation when connecting to Microsoft Teams platform.
        - Cookies when registering via the Microsoft Teams Platform. Microsoft uses necessary cookies to perform essential website functions as well as optional

cookies (social media cookies, analytics cookies and advertising cookies). The latter can be rejected by participants in the web browser.

- Image portraying speakers and/or participants (if camera is switched on)

- Subject to your consent, photographs will be taken during the event by FRA staff and may be published on FRA's website and social media channels for communication purposes.

(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, dinner and access to the venue may be collected from participants, upon consent, if they have declared in the registration form that they have such special requirements.
- The photograph of speakers and moderators provided together with their biography might reveal racial or ethnic origin, health conditions, and religious beliefs. The same applies to the images of participants photographed during the event and the image shown via Microsoft Teams in case a participant joins online.

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

3a. Information you provide us

Participants will be invited to register for the event via an e-mail sent to them by FRA, containing a link to the EUSurvey registration form. We collect the data you provide us with in the registration form and in the course of the subsequent e-mail correspondence with the FRA staff responsible for organising the meeting, as well as during your participation in the event (see section 2 of this document).

Through the registration form, and the subsequent correspondence, you will also provide FRA with the information allowing us to reimburse your travel and accommodation expenses. In the registration form you are asked to indicate, and you may also otherwise inform FRA, about special categories of personal data (such as dietary requirements for the catering and the dinner, which may reveal health information or religious beliefs, or limited information concerning health that needs to be taken into account for organising your participation, e.g. accessibility arrangements) or reveal such data during the meeting, albeit there is no intent to process such personal data beyond the purposes indicated.

For the purposes of collecting anonymous feedback on the event, FRA will use the EUSurvey tool with IP tracking switched off, so that the answers received cannot be linked to you.

3b. Information we collect about you

For accessing the FRA premises in the framework of the event, FRA will provide a list of the names of the participants for the security check at the entrance of the building. We invite you to see more information on aspects related to security and how your data is processed in the context of FRA's premises in the notice on "Access control and video surveillance systems in the context of FRA premises".

Minutes and a meeting report will be prepared for the purpose of reporting on and following up the event. The minutes will not attribute statements to named individuals, and the meeting report will not name the participants.

Upon your consent, a participant list, including name, surname, contact details, function/job title, name and type of the employer/organisation will be compiled and shared with the Frontex Fundamental Rights Officer, ENNHRI, the Council of Europe, other participants, and other relevant bodies included in the functioning of the IMM.

3c. Information we receive from other sources

In order to invite the participants, FRA will collect and process the contact details of the participants of the online meeting held on 11 June 2026, contact details obtained via publicly available contact details of potential participants found by searching online for their name, employer's name, function title, e-mail address and telephone number, contact details obtained from FRA's professional and research networks, and contact details suggested by the Frontex Fundamental Rights Officer, ENNHRI and the Council of Europe. In case an invited expert cannot attend the meeting, FRA may ask the expert to suggest other experts in their organisation 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 indicated above (Microsoft; the European Commission for the EUSurvey registration and feedback forms; and the European Commission for the processing of the financial data necessary to reimburse participants' expenses) might also process your personal data, acting as FRA's data processors.

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 is necessary for the management and functioning of the Agency. In particular, Article 6.1(b) of the FRA Founding Regulation (Council Regulation (EC) 168/2007 establishing a European Union Agency for Fundamental Rights, as amended by Regulation (EU) 2022/555) foresees the organisation of meetings of external experts as one of FRA's working methods to carry out its activities. Moreover, the activity is foreseen in project "E.2.6 Learning and guidance materials – Methodological guidance for monitoring under the Pact (pilot): develop, test and promote practical monitoring methodologies under the Pact" of the FRA Single Programming Document. Therefore, the processing is lawful under Article 5.1(a) of 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) 2018/1046 of the European Parliament and of the Council of 18 July 2018 on the financial rules applicable to the general budget of the Union. Therefore, the processing operation is lawful in accordance with Article 5.1(b) of Regulation (EU) 2018/1725.

Participants will be asked in the registration form whether they consent to their photographs be taken during the meeting and to be shared on FRA's websites and/or social media, as well as whether they agree to be included in the list of participants, containing name, surname, contact details, function/job title, name and type of the employer/organisation and shared amongst participants and with the Frontex Fundamental Rights Officer, ENNHRI, the Council of Europe, and other relevant bodies included in the functioning of the IMM. The processing is therefore lawful under Article 5.1(d) of Regulation (EU) 2018/1725

The processing of the special categories of personal data referred to in section 2(b) (such as dietary and accessibility requirements as well as those incidentally revealed by the photographs taken) is lawful under Article 10(2)(a) of Regulation (EU) 2018/1725, as the data subjects give explicit consent in the registration form.

6. Who can see your data?

A restricted number of FRA staff, in the Institutional Cooperation and EU Charter Unit (Donor-funded Programmes and Enlargement Sector) as well as in the Justice, Digital and Migration Unit (Migration and Asylum Sector) responsible for organising the expert meeting has access to your personal data. A restricted number of staff in the Administration Unit (Finance Sector) has access to the financial data when the reimbursement of travel or accommodation expenses is necessary. 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 travel and accommodation costs, the 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, where a restricted number of the Commission's staff might have access to the personal data necessary to provide technical support (see the data protection notice here).

For the collection of information on participation in the event, on dietary and accessibility requirements and on the participants' feedback, the following recipients will have access to the data of the respondents:

- the designated FRA staff organising the expert meeting;
- the European Commission as the provider of EUSurvey, which may have access only to the host and usage information;

- restricted personnel of the Agency's web development contractor Eworx S.A., which might also have access to the host and usage information.

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 (EU) 2018/1725, might have access to some personal data as indicated in the respective data protection notice referred to above.

Photographs published on FRA's website and social media channels are accessible to the general public.

This is without prejudice to a possible transmission to the bodies in charge of a monitoring or inspection task in accordance with Union legislation.

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.

Upon your consent, a participant list, including name, surname, contact details, function/job title, name and type of the employer/organisation, will be compiled and shared with the Frontex Fundamental Rights Officer, ENNHRI, the Council of Europe, other participants, and other relevant bodies included in the functioning of the IMM, to facilitate communication between the participants. Moreover, the agenda of the meeting, which includes the names, photographs and biographies of speakers and moderators, is shared with the Frontex Fundamental Rights Officer, ENNHRI, and the Council of Europe.

Photographs taken during the event may be published as described in Sections 2 and 6.

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

No, the personal data of the participants in the event will not be transferred to third countries or international organisations.

As mentioned in section 7 above, upon consent from participants, FRA will only share, at the end of the meeting, the list of participants (containing name, surname, contact details, function/job title, name and type of the employer/organisation) with the Council of Europe, which is an international organization, on the basis of Article 50 (1) (a) OF Regulation 2018/1725.

9. When will we start the processing operation?

We will start the processing operation in September 2026.

10. How long do we keep your data?

Information and personal data collected by FRA in the context of the organisation of this expert meeting will be kept for one year after the event.

Special categories of personal data relating to dietary and/or accessibility 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, and in any event no later than one month after the end of the meeting.

Information concerning the event on the FRA corporate website will be retained for five years.

Photographs published on FRA's website and social media channels will remain publicly available for as long as the relevant content is maintained online, in accordance with the retention periods of the respective platforms Photographs taken during the event and not published will be deleted after the event. Registration and feedback data will be deleted from the EUSurvey platform no later than one month after the event.

The data related to the financial and legal identification form for business partners and the supporting documents needed for the reimbursement of participants are 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).

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 e-mail request to DFPE@fra.europa.eu

11.1 Do we need your consent?

The incidental processing of special categories of personal data referred to in Section 2b will be based on your explicit consent, which will be collected via the registration form. Moreover, consent will be requested to take photographs during the meeting to be published on FRA's website and social media channels for communication purposes, as well as sharing the list of participants (including name, surname, contact details, function/job title, name and type of the employer/organisation) among the Frontex Fundamental Rights Officer, ENNHRI, the Council of Europe, other participants, and other relevant bodies included in the functioning of the IMM.

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 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 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. Do we do automated decision making, including profiling?

Your personal data will not be used for an 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 unauthorized access, use or disclosure. We keep your data stored on computer systems with limited access to specified personnel 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 DFPE@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.

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.

END OF DOCUMENT

Electronically signed on 16/09/2026 15:38 (UTC+02) in accordance with Article 11 of Commission Decision (EU) 2021/2121