DATA PROTECTION NOTICE

"Expert meeting of national fundamental rights bodies designated under Article 77 of the AI Act" organised by the European Union Agency for Fundamental Rights (FRA), on 18-19 January 2027, 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 of national fundamental rights bodies designated under Article 77 of the AI Act" by the European Union Agency for Fundamental Rights (FRA), on 18-19 January 2027, in Vienna at FRA premises for the reception on day 1 and at Savoyen Hotel for the full day 2 (hereinafter: the event). The meeting will be carried out with contributions from the European Network of National Human Rights Institutions (ENNHRI) and the European Network of Equality Bodies (Equinet).

The processing activities include sending out invitations to participants, handling registration and attendance, organising travel and accommodation arrangements for some participants, granting access to the venue, the logistical work and additional equipment necessary for hosting the event, the organisation of the reception on 18 January 2027 at FRA premises and the catering during the meeting on 19 January 2027 at the Savoyen Hotel, 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, taking of minutes during the event, distribution of reports/minutes and meeting follow-up.

FRA, acting as data controller, is responsible for the overall organisation of the event and communication with the participants before and after the end of the event. To carry out the activities above, FRA is supported by its external contractor ICF Next S.A. (part of Spectra consortium), acting as a processor (see details under section 4). FRA will share limited information about event invitees and/or participants with ENNHRI and Equinet in order to guarantee effective outreach and relevance for participants of the meeting, which include ENNHRI and Equinet members, respectively. Upon consent, limited information about participants (name, position, organisation and email) will be shared with other participants.

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, preferred personal pronouns, first name, middle name (optional), last name.
  - In addition, the following data is collected for participants whose travel and accommodation will be covered and/or organised by FRA's contractor ICF Next S.A. on behalf of FRA: nationality, date of birth (for those requiring flight tickets), ID/passport number (for those travelling outside the EU) and the date of expiry of the travel document (for non-EU citizens)
- Contact details: e-mail address, mobile phone number
- Employment details: organisation/institution, job title/function, country of the organisation, organisation/institution type
- Other (please give details):

- For participants for whom travel and accommodation is organised, in addition these details will be required:
  - City of departure and return
  - Means of transport
  - Date and time of departure to Vienna
  - Date and time of return from Vienna
  - Accommodation details
  - Financial details (IBAN number, bank information)
  - Supporting documents (e.g. invoices, tickets etc.)
- EUSurvey, which will be used for the registration, 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.
- Pictures of participants might be taken during the event and shared on FRA website and/or social media, upon consent. Participating organisations might repost stories or posts, or refer to articles on FRA website.
- Photographs and biographies of speakers and moderators will be gathered and shared with the participants via email.
- The meeting is a hybrid meeting, with the morning sessions taking place also online. The processor will provide the technical integration of the hybrid set-up through Microsoft Teams and will connect the complete audio and video signal from the venue AV system of the Hotel Savoyen to the online meeting. The Microsoft Teams account and the required license will be provided by the processor. The morning sessions will be recorded and transcribed through Microsoft Teams' AI-enabled transcription or note taking features (see section 4 for details).

(b) Special categories of personal data:

- The photographs of speakers and moderators provided with the biographies, as well as image of participants being photographed at the event might reveal racial or ethnic origin, and religious beliefs.
- Data concerning health and/or religious beliefs, such as dietary requirements and accessibility, necessary for the organisation of the travel and accommodation (where applicable), the catering services 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?

3a. Information you provide us

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

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).

For the organisation of the travel and accommodation of selected participants, the processor will process your contact details as well as the information you disclose in the registration form pertaining to your travel. The contractor will contact each participant via email to propose an itinerary, according to their preferences requested in the registration form. Once they approve the proposal, the contractor will send the booking confirmation.

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 the FRA contractor ICF Next via the EU Survey registration software. Participants are invited to register by FRA. FRA will also have access to the registration data. 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.

In case of online participation via Microsoft Teams, participants' IP addresses, connection details, cookies, and/or device information will be collected, as indicated in Section 2 above. More information about Microsoft's privacy and security practices is available at: https://www.microsoft.com/en-gb/privacy/privacystatement

3c. Information we receive from other sources

For identifying participants and speakers for the event, FRA has collected contact details of invitees from different sources: the professional networks of its staff and different ad hoc stakeholder meetings (where potential participants indicated their willingness to participate in this event and provided their email address), ENNHRI and Equinet, equality bodies, publicly available professional information on the internet or through the FRA CRM Contact Database, if potential participants consented to such sharing.

4. Who is responsible for processing your personal data?

FRA is responsible for the processing of your personal data, and it determines the objective of this processing activity. The Head of Justice, Digital and Migration Unit (JDM) is responsible for this processing operation.

ICF Next, 17 Avenue Marnix, 1000 Brussels, Belgium supports FRA in the organisation of this event, acting as data processor. A contract between FRA and Spectra has been signed
for this purpose.

For the implementation of the contract, ICF Next S.A.works with the following entities, acting as sub-processors and/or separate controllers:

- Travel organisation: IP Travel (see privacy policy for more information)
- Hotel: Hotel Savoyen Vienna. Be aware that the hotel will further process your personal data outside of the control of FRA, as data controllers in their own right and subject to their own privacy policy which can be consulted at the Hotel Group's Privacy Statement.

Web stream: Microsoft Teams as mentioned in paragraph 3(b). The Microsoft Team meeting covering the morning sessions will be recorded and transcribed through Microsoft Teams' AI-enabled transcription or note taking features. The recording, transcript, meeting chat, and generated notes or summaries will be used only for internal note taking purposes, including follow up actions. Recording and transcripts will not be used to train AI models. These are stored and manage in ICF's Microsoft O365 subject to access controls, retention and confidentiality requirements. ICF's M365 data is stored in the EU. Nevertheless, data subjects shall be informed that Microsoft is a US-based company; their compliance website is available here: General Data Protection Regulation - Microsoft GDPR | Microsoft Docs.

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 project 'F. Data, Artificial Intelligence and Digitalisation' of the FRA Single Programming Document 2026-2028 p. 40. Therefore, the processing is lawful under Article 5.1(a) of the Regulation (EU) No 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 the FRA website and/or social media, as well as whether they agree to be included in the list of participants and shared amongst participants at the end of the meeting. The processing is therefore lawful under Article 5.1(d) of Regulation (EU) 2018/1725.

The processing of the special categories of personal data mentioned in section 2 (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 (National Partnerships and Networks Sector) as well as in the Justice, Digital and Migration Unit (Data and Digital Sector) responsible for organising the expert meeting has access to your personal data.

Limited access to your personal data will be given to the processor,ICF Next S.A., and sub-processors, IP Travel, Hotel Savoyen Vienna, Microsoft and EU Survey bound by confidentiality clauses, involved in the organisation of the event, as outlined in sections 2 and 3 above.

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

7. Do we share your data with other organisations?

Personal data is processed by the Agency and its processors only. In case that 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 Organizations

Your data will not be transferred to third countries or International Organisations.

The online tool Microsoft Teams used by the processors/sub-processors under the terms of their respective license to carry out the online event participation is a US based company, therefore it cannot be completely discarded that limited personal data transfers take place. Principally, Microsoft processes and stores personal data within the EU/EFTA. Where limited transfers outside the EU/EEA may occur (for example in the context of support operations), these are covered by the contractual safeguards included in the Microsoft DPA and the applicable Standard Contractual Clauses. Such transfers, if any, fall under the adequacy decision for the EU-US Data Privacy Framework adopted by the European Commission on 10 July 2023.

9. When will we start the processing operation?

We will start the processing operation in October 2026.

10. How long do we keep your data?

The Agency will keep the data 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.

For information about the retention periods of EU Survey, please consult the privacy statement.(section 4).

ICF Next will keep the registration data for no longer than the date of 31 March 2026. The data related to the financial and legal identification form for business partners and the supporting documents needed for the reimbursement of participants will be retained only for as long as necessary to verify and complete the reimbursement and meet any applicable contractual, accounting or audit requirements, after which it will be securely deleted.

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 were 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@fa.europa.eu.

11.1.1 The value of 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, position, organization and email) with the Equality Bodies, National Human Rights Institutes (NHRIs), Ombuds Institutions, Data Protection Authorities (DPAs), other participants, and other relevant bodies.

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.

11.1.2 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 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 unauthorised access, use or disclosure. We keep your data stored on our internal servers with limited access to a specified audience only.

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 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 https://www.edps.europa.eu/data-protection/our-role-supervisor/complaints_en, 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