

PRIVACY NOTICE

Roma stakeholders contact list

The European Union Agency for Fundamental Rights (FRA) 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 privacy 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 we collect personal data?

1a. The provision of personal data is required to guarantee business continuity in the FRA Roma stakeholder relations, which are necessary in order to fulfil the Agency's obligations towards its multi-annual framework (MAF) 2018-2022, and in particular, point h. hereof, i.e. "integration and social inclusion of Roma".

1b. Possible implications for not having such data would be the non-fulfilment of the FRA's obligations under the multi-annual framework (MAF) 2018-2022, and in particular point h. "Roma integration and social inclusion" hereof.

2. What kind of personal data does the Agency collect?

- We process the following data in the Roma stakeholders contact list: personal details, i.e. name and surname of the contact person, position/role and organisation the person is working for;
- contact details, i.e. contact person's e-mail address, telephone, mobile and fax number, postal address incl. country of the organisation.

3. How we collect your personal data?

3a. Information you provide us: You may provide us with information in several ways, including by data in the FRA contact management tool CRM that you update or add yourself or by corresponding with us by letter, phone, email and live chat, etc.

3b. Information we collect about you: We may collect information about you through our direct communication with you or through specific online or paper surveys on the topic of Roma. We will provide all relevant information about how we process your data in every case.

3c. Information we receive from other sources: In case we receive personal data relating to the FRA's work on Roma from other sources, e.g. Roma stakeholders, EU institutions and bodies, civil society organisations, NGOs, IGOs, or international organisations, for which we identify a need to process it, we will store it in the FRA contact management tool. The tool will then immediately send an e-mail to the contact person, providing the necessary details and asking for consent. If you do not provide us with your explicit consent then your personal data will be deleted from our contact lists including the CRM application.

4. Who is responsible for the processing of 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 Technical Assistance & Capacity Unit is responsible for this processing operation.

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5. Which is the legal basis for this processing operation?

The processing operation is necessary for the management and functioning of the Agency under FRA MAF 2018-2022, h. integration and social inclusion of Roma. Therefore, the processing is lawful under Article 5(a) of the Regulation (EU) No 2018/1725.

6. Who can see your data?

Only designated FRA staff will have access to the Agency's Customer Relationship Management system (CRM) tool. Besides CRM, Roma stakeholder contacts may be kept in outlook folders of designated FRA staff, trainees and study visitors working on the topic of Roma and in the FRA's Data Management System (DMS). While most of those colleagues will be assigned to the Technical Assistance & Capacity Building Unit, also staff in other units who work on the same topic may be granted access to it, given FRA's horizontal programme and project structure.

7. Do we share your data with other organisations?

Personal data is processed by the Agency 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?

Not applicable.

9. When we will start the processing operation?

We will start the processing operation for the above-mentioned purpose in July 2019.

10. How long do we keep your data?

The personal and contact data in the FRA's contact management tool (CRM), DMS, and the personal outlook folders of designated FRA staff will be retained as long as the Agency will work on the topic of Roma in accordance with its MAF and annual work programmes. The current MAF is valid until 31 December 2022. In case the Agency ceases to work on that topic, the data will be retained for another 5 years, in case a new MAF or annual work programme would take up the topic again. If after 5 years this is not the case, FRA will erase the data.

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11. How can you control your data?

You can access, modify or delete your personal data by sending an email request to Romaprogramme@fra.europa.eu or by following the direct link to the FRA contact management tool CRM provided in the e-mail asking for your consent. More details are provided below.

11.1. How valuable is your consent for us?

1. Consent/explicit consent in case of sensitive data: We are asking you for your explicit consent by e-mail sent from the FRA contact management tool CRM. The tool will provide the possibility for the data subject to access your personal data with the possibility of adding, rectifying and erasing it at any time. In case the consent is not provided within a period of three months from the date of request for consent, the existing data in CRM will be deleted by FRA.
2. You enjoy the rights to withdraw your consent at any time.

11.2. Your data protection rights

Under data protection law, you have rights we need to make you aware of these rights. The rights available to you depend on our reason for processing your information.

a) Can you access your data?

You have the right to receive confirmation whether or not we process your personal data. Furthermore, you can have access to such data, as well as obtain copies of your data undergoing processing, at any time and free of charge, by sending an email request to Romaprogramme@fra.europa.eu.

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 by sending an email request to Romaprogramme@fra.europa.eu.

c) Can you restrict us from processing your data?

You have the right to block the processing of your personal data at any time by sending an email request to Romaprogramme@fra.europa.eu when you contest the accuracy of your personal data or when the Agency no longer needs the data for completing its tasks. You can also block the processing activity when the operation is unlawful, and you oppose to the erasure of the data.

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d) Can you delete your data?

You have the right to ask us to delete your data at any time by sending an email request to Romaprogramme@fra.europa.eu when the processing activity is unlawful.

e) Can you request the transfer of your data to a third party?

This only applies to information you have given us. You have the right to ask that we transfer the information you gave us from one organization to another, or give it to you. The right only applies if we are processing information based on your consent or under, or in talks about entering into a contract and the processing is automated.

You are not required to pay any charges for exercising your rights. We have 15 working days to respond to you.

f) Do you have the right to object?

Yes, you have the right to object at any time by sending an email request to Romaprogramme@fra.europa.eu when you have legitimate reasons relating to your particular situation. Moreover, you will be informed before your information is disclosed for the first time to third parties, or before it is used on their behalf, for direct marketing purposes.

The Agency will address your requests within 15 working days from the receipt of the request.

g) Do we do automated decision making, including profiling?

No, we do not apply any automated decision making, including profiling.

12. What security measures are taken to safeguard your personal data?

The Agency has in place several security controls to protect your personal data from unauthorised access, use or disclosure. We keep your data stored on computer systems with limited access to a specified audience only. In this specific case, your personal data is stored in the FRA contact management tool CRM. Access is based on role based accounts and involved staff have their own account. Also there is an audit trail function available.

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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 Romaprogramme@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 we update our privacy notice?

We keep our privacy notice under regular review to make sure it is up to date and accurate.

END OF DOCUMENT