

## PRIVACY NOTICE

The Agency would like to inform the users of the FRA website and web services that the following data are being subsequently processed their visit to the site.

Users of the FRA website and web services may be classified into the following types of data subjects:

1. **Anonymous users** – those who browse the website anonymously and do not use any FRA web service requiring the submission of personal data.
2. **Subscribed users** – those who have subscribed to or used one or more FRA web service requiring the submission of personal data.

### FRA Website and Web Services Data

**Purpose:** There are several purposes of the processing of the personal data:

1. The purpose of **settings cookies** is to store user settings and preferences such as language, font size, tenders subscribed to, etc. This enables the Agency to provide an improved user experience as the user does not have to keep re-entering the same data whenever they re-visit the FRA website.
2. The purpose of the **analytics cookies** is to identify whether or not the user has consented to be tracked and, if they have consented, to provide a unique ID to enable the tracking function.
3. The purpose of the **multimedia cookies** is to enable the playback of videos if the user has consented to the use of such cookies.
4. The purpose of the **web analytics tool** is to enable FRA to understand better which are the most popular topics, pages, reports, etc. on its website, by collecting and analysing data on visits to and downloads from the website.
5. Other purposes are (i) to enable FRA to provide the subscribed users with services regarding recruitment, procurement, access to documents, Clarity tool, and (ii) to provide a more personalised service via e-mail alerts, etc.

**Description of Data:** The data processed consist of the following categories:

**1. A) Cookies:** session cookies containing user settings and preferences (e.g. font size, language, etc.). For other cookies see 1. B), 2. B) below.

When a user first visits the website, they are informed about the cookies and analytics used via a banner based on the EU Commission's [Cookie Consent Kit](#). If the user declines to accept cookies, a first party cookie is set with the user preference and no further cookies are set, and no user tracking is done (see section 1b below). If the user declines cookies, any sections of the website requiring the use of cookies, for example viewing videos, will display a message in place of the restricted content to say that content is not available

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because cookies have not been accepted. For more details, see the [Cookies section](#) on the [About this website](#) page.

**1. B) Analytics:** first-party cookie containing unique user ID; IP address of visitors anonymised with 2 bytes masked; browsing information (e.g. pages visited or files downloaded).

The analytics tool used is Piwik, which has been recommended by various independent bodies (ULD, Germany and CNIL, France) as privacy-compliant web analytics software. When a user first visits the website, they are informed about the cookies and analytics used via a banner. The JavaScript tracking function of the analytics software (Piwik) requires cookies to work, therefore if the user declines to accept cookies, a first party Piwik cookie is set with the user preference and no user tracking is done. If the user accepts cookies, a first party Piwik cookie is set containing a unique user ID and the user's browsing information is sent to the web analytics software which is hosted on FRA web server located in Bilbao, Spain. In addition, server log-based analytics store browsing information including an anonymised IP address with 2 bytes masked on the FRA web server. The user can revoke their consent to be tracked at any time by clicking [the Object to Piwik use link](#) on the [About this website](#) page.

**2. A) Applicants for vacancies, selections or internships:** user name, address, contact details, date of birth, gender, nationality, languages, education and qualifications, work history.

Users who apply for vacancies, selections or internships are requested to submit certain personal data including name, address, and contact details as part of their application. For full details see the [Privacy statement on recruitment](#) and the [Privacy statement on internship](#).

**2. B) Subscribers to procurement updates:** E-mail address, and optionally name, address and organisation; first-party cookie(s) containing ID number of tender(s) subscribed to.

Users who subscribe to receive updates on Calls for Tender are requested to submit their e-mail address and optionally their name, address and organisation to receive updates. Subscribing sets a first party cookie containing the ID number of the tender. This cookie controls the display of the "Register for updates on this Call for tender" form that appears on each Call when the user visits it for the first time. Users may unsubscribe at any time by clicking the "Unsubscribe" button on the relevant Call for Tender, which also deletes the cookie for that Call. For full details, please see the statement on [Protection of personal data in relation to procurement procedures and contract management](#).

**2. C) Subscribers to e-mail alerts:** Name, e-mail address.

Users may subscribe to FRA e-mail alerts to receive monthly or weekly updates on themes of their choice. Subscribers to e-mail alerts are requested to provide their name and e-mail address when subscribing. They

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may edit their data at any time or delete their data entirely by logging in to their user account and clicking the "Cancel account" button. An automated process ensures that 12 months after the registration, the user has to confirm the subscription or they will be removed from the system.

**2. D) Users who request access to documents:** name, address, contact details.

Users who request access to documents are requested to submit certain personal data including name, address, and contact details as part of their application. For full details see the [Information note for data subjects requesting access to documents](#).

**2. E) Users of Clarity tool:** username and contact details if the user chooses to submit these to a relevant national body that accepts them. For more details, see the [Information note](#). Users of the Clarity tool should note that personal data might be sent via the tool to a national non-judicial body if both the user and the body agree to send/accept data in this manner. Such data may also be stored in an e-mail sent to a FRA e-mail account if the user agrees to be contacted by the Agency for follow-up purposes

**2. F) Users who contribute case studies/feedback for JUG toolkit:** name, organisation, contact details, case study details.

**2. G) Users who take part in online surveys or consultations:** varies according to survey. For more details, see the specific Information notes accompanying the surveys and consultations, which can be found on the starting page of each online survey or consultation and also on the [Data protection page](#).

**Data Controller:** The Data Controller is the Agency. The Head of Fundamental Rights Promotion is the responsible for this processing operation. The data is available upon request to the Head of Fundamental Rights Promotion Department.

**Legal Basis:** The Legal basis of the processing operation for which the data are intended is Article 5 (a) and (d) of Regulation (EC) No 45/2001.

**Access to the Data:** Data can be accessed by:

1. The selected FRA staff of the relevant departments;
2. The authorised staff of the FRA web contractors based in EU countries that are compliant with the EU Data Protection Directive.
3. Data submitted via the Clarity tool may be accessed by the authorised staff of the relevant bodies based in EU that are compliant with the Data Protection Directive.

Data Subjects are informed of the following rights in line with Articles 13, 14, 15, 16, 17 and 18 of Regulation (EC) No 45/2001:

- **Right of access** – Data subject has the right to access his or her personal data at any time, and free of charge, by sending an email request to the [information@fra.europa.eu](mailto:information@fra.europa.eu) or [clarity@fra.europa.eu](mailto:clarity@fra.europa.eu)

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for data submitted via the Clarity Tool. The Agency will address the request within 15 working days from the receipt of the request.

- **Right to rectify** – Data subjects have the right to rectify their data without delay of inaccurate or incomplete personal data at any time (exceptions could apply) by sending an email request to the [information@fra.europa.eu](mailto:information@fra.europa.eu) or [clarity@fra.europa.eu](mailto:clarity@fra.europa.eu) for data submitted via the Clarity Tool. The Agency will address the request within 15 working days from the receipt of the request.
- **Right to block** – Data subjects have the right to block their data at any time by sending an email to the [information@fra.europa.eu](mailto:information@fra.europa.eu) or [clarity@fra.europa.eu](mailto:clarity@fra.europa.eu) for data submitted via the Clarity Tool, where their accuracy is contested by the data subject; or the controller no longer needs them for the accomplishment of its tasks but they have to be maintained for purposes of proof; or the processing is unlawful and the data subject opposes their erasure and demands their blocking instead. The Agency will address the request within 15 working days from the receipt of the request.
- **Right to erasure** – Data subjects have the right to request to the controller at any time the erasure of their data, if their processing is unlawful, particularly where the provisions of Sections 1, 2 and 3 of Chapter II of Regulation 45/2001 have been infringed, by sending an e-mail to [information@fra.europa.eu](mailto:information@fra.europa.eu) or [clarity@fra.europa.eu](mailto:clarity@fra.europa.eu) for data submitted via the Clarity Tool. The Agency will address the request within 15 working days from the receipt of the request.
- **Right to obtain notification to third parties** – Data subjects have the right to obtain from the controller the notification to third parties to whom the data have been disclosed of any rectification, erasure or blocking pursuant to Article 13 to 16 of Regulation 45/2001, at any time unless this proves impossible or involve a disproportionate effort. The Agency will address the request within 15 working days from the receipt of the request.
- **Right to object** – Data subjects have the right:
  - To object at any time by sending an email request to the [information@fra.europa.eu](mailto:information@fra.europa.eu) or [clarity@fra.europa.eu](mailto:clarity@fra.europa.eu) for data submitted via the Clarity Tool, on compelling legitimate grounds relating to their particular situation, to the processing of data relating to them, except in the cases covered by Article 5(b), (c) and (d). Where there is a justified objection, the processing in question may no longer involve those data. The Agency will address the request within 15 working days from the receipt of the request.
  - To be informed before personal data are disclosed for the first time to third parties or before they are used on their behalf for the purposes of direct marketing, and to be expressly offered the right to object free of charge to such disclosure or use. The Agency will address the request within 15 working days from the receipt of the request.
- **Right to have recourse** – Pursuant Article 11 of Regulation 45/2001, data subjects have the right to have recourse at any time to the European Data Protection Supervisor: <http://www.edps.europa.eu>.

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If the data subjects have any queries concerning the processing of their personal data, they may address them to the Head of FRPD, by contacting the [information@fra.europa.eu](mailto:information@fra.europa.eu).

**Date when processing starts:** The date when the data subject visits the website and, where applicable, the data subject submits personal data (e.g. subscribers to email alerts, applicants for vacancies, etc.). For data submitted to third parties (relevant national bodies) via the Clarity tool, the processing by third parties starts on the date when the data subject submits personal data via Clarity to a relevant national body, provided that both parties agree to send/receive the data.

### Place of storage:

1. A) Cookies: stored on the end-user's device;

1. B) Analytics and 2. A) 2. D), 2. F)-2. G) Subscribed users: Data centre of the FRA web-hosting contractor (Bilbao, Spain).

2. E). Users of Clarity tool: FRA e-mail server. Personal data may also be stored by national non-judicial bodies if they accept such data.

### Retention policy:

1. A) Cookies:

Session cookies – expire at the end of session;

Tender subscription cookies – 1 year;

Analytics cookies – 13 months;

1. B) Analytics:

Piwik log data – 180 days;

Web server log data – 54 weeks;

2. A) Applicants for vacancies, selections or internships: 5 years;

2. C). Subscribers to e-mail alerts: 1 year;

2. E) Users of Clarity tool:

Data stored on FRA e-mail server – 6 months;

Email address, name, surname and other optional fields – 8 months;

Data stored by national bodies – dependent on retention policy of national body;

2. F) Users who contribute case studies/feedback for JUG toolkit: For as long as toolkit is online;

2. B), 2. D), 2. G) Other subscribed users: varies – see the individual Information notes for details (see links in section Processing Operations above).