Handling of contact data stored in the Agency contacts database (CRM)

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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PRIVACY NOTICE

1. Why do we collect personal data?
We collect personal data to enable FRA to inform the interested parties, who are registered in our Customer Relationship Management (CRM) database, on the upcoming activities of the Agency.

2. What kind of personal data does the Agency collect?
The Agency collects data relating to identification and contact details: name, surname, email address, organisation, job title, phone number, fax number, preferences related to thematic areas on which the Agency undertakes activities. The CRM systems also log information where you have received or opened the email sent by us.

3. How do we collect your personal data?
3a. Information you provide us i.e. You may provide us with information in several ways, including by filling in forms on our websites or by corresponding with us by phone, email and live chat, etc.
3b. Information we collect about you when you use our websites, we automatically collect information about your device, use of cookies, including your IP address, information about your visit (including how you got to our websites) and how you use our services. We may combine this information with other information you have provided to us or which we have received from other sources.
3c. Information we receive from other sources that provided your contact details to the Agency.

4. Who is responsible for the 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 Communications & Events is responsible for this processing operation.

5. Which is the legal basis for this processing operation?
Informing interested parties about the upcoming activities of the Agency is necessary for the management and functioning of the Agency. Therefore, the processing is lawful under Article 5(a) of the Regulation (EU) No 2018/1725.
In addition, since being in our database is not mandatory, the processing of the personal data is also in accordance with Article 5(d) of Regulation (EU) No 2018/1725.

6. Who can see your data?
All the requests of the persons who would like to be informed about our activities are directed towards the staff members dealing with the contact data stored.

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?
No.
PRIVACY NOTICE

9. When we will start the processing operation?
We will start the processing operation when you request to be included in the Agency’s mailing list to receive the last information about our upcoming activities.

10. How long do we keep your data?
We keep your contact information until you decide to unsubscribe from our mailing system. You have the option to be excluded from the mailing list, and this is possible as in every received email there is an “Unsubscribe” option. The tracking information is kept for a period of 5 + 1 years because this is the reporting period for the evaluation of our performance.

11. How can you control your data?
You can access, modify or delete your personal data by sending an email request to information@fra.europa.eu. More details are provided below.

11.1. How valuable is your consent for us?
Since being in our database is not mandatory, the processing of the personal data is also in accordance with Article 5(d) of Regulation (EU) No 2018/1725. Accordingly, you have the right to withdraw 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 information@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 information@fra.europa.eu. You have the right to update or correct at any time your identification data.

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 information@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.

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 information@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 organisation 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.

f. Do you have the right to object?
Yes, you have the right to object at any time by sending an email request to information@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.

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 computer systems with limited access to a specified audience only.
All data is stored in the Agency’s CRM application hosted by the Agency. To allow better management of its communication activities, the Agency makes use of an external “cloud” service provider. This cloud service allows mass emailing and collection of statistical information. For example, it provides information regarding the correct sending of the email; whether you opened the email or deleted it etc. The cloud service provider’s data centre is based in Europe. The information is stored in the CRM application hosted at FRA’s premises and not in the cloud. The Agency uses the statistical information in an aggregated format.

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