

Roma Survey 2020

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 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 do we collect personal data?

The purpose of the processing of the personal data is to collect comparable data in 10 survey countries (eight EU Member States – CZ, EL, ES, HR, HU, IT, PT, RO; two accession countries – MK and RS) to support the EU in protecting the fundamental rights of persons with Roma or Travellers background. The survey will collect data on respondents' household situation, their experiences of discrimination in the areas of employment, health, housing, education and other services, experiences of hate crime and rights awareness. All data processed in FRA are fully anonymised and processed to (1) check on data quality during field work (2) to produce indicators and results to provide evidence on the situation of fundamental rights.

Starting from October 2020, our contractor Kantar Belgium SA using the national polling agencies (local sub-contractors in the survey countries) will be interviewing data subjects from the Roma and Travellers populations.

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

We will collect only the following personal data necessary for the processing operation described above.

(a) Data collected via the questionnaire which include Additionally to these data we will also collect the name, address and telephone number of the respondents. These will be used for keeping contract during the interview process and for quality check purposes and be accessible via the "Quality Check" manager of the national sub-contractors. It will not be provided to the main contractor Kantar Belgium or FRA. Further the polling agency may collect contact details of cooperating individual and contact persons at municipal level to be able to get into contact with respondents or learn about the locality. These data will be only used for contacts but not processed.

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(b) Special categories of personal data:

In our survey we may collect sensitive personal data, such as information about your racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, data concerning physical or mental health or data concerning sex life or sexual orientation. We will only collect this kind of data if you have given your explicit consent to do so.

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Commented [MT(3)]: This is still considered processing

The data resulting from the survey and transmitted to Kantar Belgium and FRA will be anonymous. Respondents' answers to the survey will be stored in a data set. Individual respondents cannot be identified from the data set. The results will be reported in aggregate format (e.g. as percentages or mean values) so that it will not be possible to recognise individual respondents from the results.

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3. How do we collect your personal data?

We collect your personal data via the questionnaire you complete.

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 Research and Data Unit is responsible for this processing operation. This survey is conducted by Kantar Belgium SA on behalf of FRA, with FRA being the data controller and Kantar Belgium the data processor.

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

This processing operation is necessary to conduct the Roma survey 2020. Such surveys are foreseen by the Agency's Founding Regulation (Regulation 168/2007), in particular article 4 thereof. Therefore, the processing is lawful under Article 5(a) of the Regulation (EU) No 2018/1725. In addition, since the participation to the survey is not mandatory, the processing of your personal data is also in accordance with Article 5(d) of Regulation (EU) No 2018/1725.

6. Who can see your data?

Your data will be accessible only by the specific sub-processor of each country. The data resulting from the survey and transmitted to Kantar Belgium and FRA will be anonymous.

7. Do we share your data with other organisations?

No. Personal data is processed by the Agency and its processors mentioned above.

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

Your personal data may be collected, stored, transferred or processed by our sister companies within the WPP group, or third party service providers for research-related purposes, such as data processing, both within and outside the EEA. They are all contractually bound to keep any information they collect and disclose to us or, we collect and disclose to them, confidential and must protect it with security standards and practices that are equivalent to our own.

Where these transfers are across borders or outside the EEA we shall put safeguards in place to ensure the transfer is made by a legitimate method for the purposes of EU data protection law and secure

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9. When we will start the processing operation?

We will start the processing operation in October 2020.

10. How long do we keep your data?

Personal data will be retained for no longer than 12 months. As part of the Company Business Continuity plan and as required by ISO 27001, ISO 9001, ISO 20252 and in certain instances the law, our electronic systems are backed up and archived. These archives are retained for a defined period of time in a strictly

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controlled environment. Once expired, the data is deleted and the physical media destroyed to ensure the data is erased completely.

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 email request to Romasurevey2020@fra.europa.eu

11.1. How valuable is your consent for us?

Since your participation is not mandatory, we need proof that you consented to the processing of your personal data. Consent will be collected (please explain how e.g. email, forms). 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.

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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 block the processing of your personal data 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 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. 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 for the performance of a contract or for entering into a contract and the processing is automated.

f. Do you have the right to object?

Yes, you have the right to object 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.

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

No.

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

We collect your personal data in face-to-face interviews and record them on CAPI tablets (Computer Assisted Personal Interview). All CAPI tablets use the same scripting software (NIPO's Nfield system, which is ISO 27001:2013 certified). Once the interviewers synchronise their tablets, the data are transferred to the central servers. Data transfer occurs using an encrypted tunnel, access to which is authenticated by two layers of security.

Your personal data is accessed and processed only by the authorised personnel of the legal entities responsible for:

- data collection: data processing manager, fieldwork manager, quality controller and interviewers
- data processing: data processing staff

We will start the processing operation as soon as we start face-to-face interviews and collecting data. Kantar BBSS, on behalf of Kantar Belgium SA, is the legal entity responsible for the processing of your personal data and determines the methods of this processing activity.

We take appropriate technological and organisational measures to protect the personal data submitted to us, both during transmission and once we receive it. Our security procedures are consistent with generally accepted commercial standards used to protect personal data. To name a few, we apply a strict password

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policy; use of full disk encryption technologies on all PCs; use of the latest antivirus and anti-spyware software; employing multi-layer firewall architecture; the deployment of regular threat monitoring and intrusion testing tools; and regular vulnerability testing of critical network access points and of internal systems that store sensitive data. Unfortunately, no data transmission can be guaranteed to be 100% secure. However we will take reasonable steps to ensure our systems are secure.

All our employees are contractually obliged to follow our policies and procedures regarding confidentiality, security and privacy.

We adhere to the following standards and industry requirements:

- MOA and ESOMAR professional codes of conduct;
- ISO 20252 international market research quality standard;
- ISO 9001 international standard for quality management systems;
- ISO 27001 international standard for data security;

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 Romasurvey2020@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.

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