

**RECORD OF PROCESSING ACTIVITY
ACCORDING TO ARTICLE 31 REGULATION 2018/1725¹
NOTIFICATION TO THE DATA PROTECTION OFFICER**

NAME OF PROCESSING OPERATION²:

Expert meeting on fundamental rights and environmental protection in hybrid format on 16.11.2023

Reference number: DPR-2023-193 (to be completed by the DPO)
Creation date of this record: 24 October 2023
Last update of this record: 07/11/2023
Version: 1

Part 1 (Publicly available)

1) Controller(s)³ of data processing operation (Article 31.1(a))
<p>Controller: European Union Agency for Fundamental Rights (FRA) Schwarzenbergplatz 11, A-1040 Vienna, Austria Telephone: +43 1 580 30 – 0 Email: contact@fra.europa.eu Organisational unit responsible⁴ for the processing activity: Equality, Roma and Social Rights Contact details: environment@fra.europa.eu Data Protection Officer (DPO): dpo@fra.europa.eu</p>

2) Who is actually conducting the processing? (Article 31.1(a))⁵
The data is processed by the FRA itself <input checked="" type="checkbox"/>

¹ <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32018R1725>

² **Personal data** is any information relating to an identified or identifiable natural person, i.e. someone who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity. This information may, for example, be the name, date of birth, a telephone number, biometric data, medical data, a picture, professional details, etc.

Processing means any operation or set of operations which is performed on personal data, whether or not by automatic means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

³ In case of more than one controller (e.g. joint FRA research), all controllers need to be listed here

⁴ This is the unit that decides that the processing takes place and why.

⁵ Is the FRA itself conducting the processing? Or has a provider been contracted?

The data is processed also by a third party (contractor)

For email correspondence to carry out the activities that FRA undertakes in the context of the organisation of this meeting, FRA uses [Microsoft Office 365](#) cloud-based services. Therefore, Microsoft Ireland acts as FRA processor for this purpose.

Moreover, the travel agency AMEX will act as FRA processor.

In addition, FRA or FRA processors might use different online tools/systems to organise the meeting (for example, [Lime Survey](#)), which will act also as FRA processors.

The contact point for all processing operations is the Agency.

3) Purpose of the processing (Article 31.1(b))

Why are the personal data being processed? Please provide a very concise description of what you intend to achieve with the processing operation. Specify the rationale and underlying reason for the processing and describe the individual steps used for the processing. If you do this on a specific legal basis, mention it as well (e.g. staff regulations for selection procedures).

We collect the personal data of experts invited to and participating in the Expert meeting on fundamental rights and environmental protection. The meeting takes place in Vienna at FRA on 16 November 2023 from 10.00-17.00 CET. The meeting will be in hybrid format with experts participating in person at FRA but also experts participating online.

Via email correspondence we will collect personal data to allow FRA to organize the travel and accommodation of experts participating in person in the meeting and/or the payment of reimbursable costs in line with the FRA [mission guide](#);

For the organization of the expert meeting, including the travel and accommodation as well as catering arrangements, FRA and its travel agency AMEX (as FRA's processor) might collect from you the personal data described in section 5 via email correspondence with the experts and via the travel agency online booking tool "Neo" (see data protection notice [here](#)). Through email correspondence you will provide FRA with the information allowing us to book your flight and accommodation and – where applicable – to reimburse your travel expenses (e.g. since the travel agency cannot book train tickets, experts who travel by train to/from Vienna will be reimbursed by FRA for their travel expenses).

For the organisation of the hybrid meeting, the Agency uses the following cloud-based services on the basis of the inter-institutional framework contract for the provision of M365 services, of which the Agency is a part:

- MS Teams (as the online platform to carry out the hybrid meeting)

- FRA DMS SharePoint to maintain FRA list of invited experts and participating experts and any other meeting documents such as agenda, background documents or minutes.
- The FRA Environmental Protection mailbox (environment@fra.europa.eu) for centralizing all email communications related to this expert meeting. Therefore, some personal data (mainly metadata and diagnostic data) might be collected from you and processed by such applications as indicated in FRA's MS365 [data protection notice](#).

Other online tools/systems used for the sharing of files, and/or online consultation or scheduling meetings which FRA or its contractors might use for the purposes of communicating with you or organizing meetings might also collect and process some personal data (such as IP addresses, cookies, metadata or information about your device). In particular, for this meeting FRA uses:

- [LimeSurvey](#) (professional online survey tool).

In case other tools/systems are used by FRA for the meeting, you will be informed accordingly via email correspondence.

In case an invited expert cannot attend the meeting, FRA may ask the expert to suggest other experts in their organisations to be invited to the meeting.

4) Description of the categories of data subjects (Article 31.1(c))

Whose personal data are being processed?

FRA staff

Non-FRA staff (expert invited to the meeting, experts participation in the meeting)

5) Categories of personal data processed (Article 31.1(c))

Please tick all that apply and give details where appropriate

(a) General personal data (add or delete as appropriate – the data in the brackets are only examples)

Personal details

Personal details: civic title, first name, surname, gender. For organising travel and accommodation, participants may be required to provide data of birth, nationality, ID or passport number to FRA or to FRA's travel agency. Collecting such data might be necessary in those cases to comply with the national and international laws applicable to travels and air carriers.

For the list of participants, FRA may collect participants' photos and work experience.

For experts who receive reimbursement of travel, a copy of the ID or passport is required as well as the address and bank account information.

Contact details
e-mail address, phone, mobile phone numbers (optional), postal address

Education & Training details
For the list of participants, FRA may collect participants' educational background.

Employment details (function/title, name, and type of the employer/organisation)

Financial details
Financial identification form and bank account information for those experts who receive reimbursement of travel/accommodation expenses.

Family, lifestyle and social circumstances

Goods or services provided

Other (please give details):

- Images, messages, chats, questions, FRA documents, audio and/or video recordings of the participants as the meeting is in hybrid format and/or transcripts for minute-taking.

- IP addresses and/or cookies of participants and other metadata may also be collected by the online tool used for the hybrid format of the meeting.

(b) Special categories of personal data (Article 10)

The personal data collected reveal:

Racial or ethnic origin
Ethnic origin might be incidentally revealed by the image and video recording when participants switch on their cameras for the hybrid format of the meeting.

Political opinions	<input checked="" type="checkbox"/>
Political opinions might be incidentally revealed by the image and video recording when participants switch on their cameras for the hybrid format of the meeting.	
Religious or philosophical beliefs	<input checked="" type="checkbox"/>
Religious and/or physical impairments and/or philosophical beliefs might be incidentally revealed by the image and video recording when participants switch on their cameras for the hybrid format of the meeting.	
Food preferences might also reveal religious beliefs, only in the context of catering and/or dinners offered during in person meetings organised by FRA.	
Trade union membership	<input type="checkbox"/>
Genetic, biometric or data concerning health	<input checked="" type="checkbox"/>
Food preferences indicated by the participants may reveal health conditions, religious beliefs, etc. for catering and dinner offered by FRA.	
Limited information on health conditions (e.g. special accommodation required by participants with disabilities) that need to be taken into account for organising the FRA meeting.	
Information regarding an individual's sex life or sexual orientation	<input type="checkbox"/>
N/A	<input type="checkbox"/>
(c) Personal data relating to criminal convictions and offences (Article 11)	
Criminal record (or similar, e.g. declaration of good conduct)	<input type="checkbox"/>
N/A	<input type="checkbox"/>

6) Recipient(s) of the data (Article 31.1 (d))

*Recipients are all parties who have access to the personal data. Who will have access to the data **within** FRA? Who will have access to the data **outside** FRA? No need to mention entities that may have access in the course of a particular investigation (e.g. OLAF, EO, EDPS).*

Designated **FRA** staff members
(Equality, Roma and Social Rights Unit)



A restricted number of FRA staff responsible for organising the expert meeting has access to your contact details. A restricted number of staff in Corporate Services (Finance Sector) has access to the financial data when the reimbursement of travel or accommodation expenses is necessary. Assigned staff from Corporate Services (Digital Services) might have access to some personal data necessary to provide technical support.

Recipients **outside** FRA:



In case of reimbursement of costs to experts, their financial and/or legal identification forms incl. supporting documents are transferred to the European Commission (DG Budget) in order to validate data subjects' details in the European Union's accounting system ABAC. Data is processed in this regard in line with FRA's data protection notice [here](#)

Moreover, restricted staff of FRA contractors, which are bound by specific contractual clauses for any processing operations of experts' personal data on behalf of FRA, and by the confidentiality obligations deriving from Regulation (EC) 2018/1725) might have access to some personal data as indicated in the respective data protection notices referred to above.

7) Transfers to third countries or international organisations (Article 31.1 (e))⁶

If the personal data are transferred outside the European Economic Area or to international organisations, this needs to be specifically mentioned, since it increases the risks of the processing operation.

Transfer outside of the EU or EEA

Yes



No



However, the transfer of limited personal data (diagnostic data) outside the EU and EEA might occur when using MS Teams and other online tools/systems mentioned above to hold the expert meeting in a hybrid format. We refer to the respective data protection notices for more information.

If yes, specify to which country:

⁶ **Processor** in a third country using standard contractual clauses, a third-country public authority you cooperate with based on a treaty. If needed, consult your DPO for more information on how to ensure safeguards.

Transfer to international organisation(s)

Yes

No

If yes specify to which organisation:

Legal base for the data transfer

Transfer on the basis of the European Commission's adequacy decision (Article 47)

Transfer subject to appropriate safeguards (Article 48.2 and .3), specify:

a) A legally binding and enforceable instrument between public authorities or bodies.

Standard data protection clauses, adopted by

b) the Commission, or

c) the European Data Protection Supervisor and approved by the Commission, pursuant to the examination procedure referred to in Article 96(2) .

d) Binding corporate rules, Codes of conduct , Certification mechanism pursuant to points (b), (e) and (f) of Article 46(2) of Regulation (EU) 2016/679, where the processor is not a Union institution or body.

Subject to the authorisation from the European Data Protection Supervisor:

Contractual clauses between the controller or processor and the controller, processor or the recipient of the personal data in the third country or international organisation.

Administrative arrangements between public authorities or bodies which include enforceable and effective data subject rights.

Transfer based on an international agreement (Article 49), specify:

Derogations for specific situations (Article 50.1 (a) –(g))

N /A

Yes, derogation(s) for specific situations in accordance with article 50.1 (a) –(g) apply
In the absence of an adequacy decision, or of appropriate safeguards, transfer of personal data to a third country or an international organisation is based on the following condition(s):

(a) The data subject has explicitly consented to the proposed transfer, after having been informed of the possible risks of such transfers for the data subject due to the absence of an adequacy decision and appropriate safeguards

(b) The transfer is necessary for the performance of a contract between the data subject and the controller or the implementation of pre-contractual measures taken at the data subject's request

(c) The transfer is necessary for the conclusion or performance of a contract concluded in the interest of the data subject between the controller and another natural or legal person

(d) The transfer is necessary for important reasons of public interest

(e) The transfer is necessary for the establishment, exercise or defense of legal claims

- (f) The transfer is necessary in order to protect the vital interests of the data subject or of other persons, where the data subject is physically or legally incapable of giving consent
- (g) The transfer is made from a register which, according to Union law, is intended to provide information to the public and which is open to consultation either by the public in general or by any person who can demonstrate a legitimate interest, but only to the extent that the conditions laid down in Union law for consultation are fulfilled in the particular case

8) Retention time (Article 4(e))

How long will the data be retained and what is the justification for the retention period? Please indicate the starting point and differentiate between categories of persons or data where needed (e.g. in selection procedures candidates who made it onto the reserve list vs. those who didn't). Are the data limited according to the adage "as long as necessary, as short as possible"?

Information and personal data collected by FRA in the context of the organization of this meeting will be kept for one year after the meeting. Personal data collected by FRA's contractors in the context of the meeting will be deleted after the end of the respective contract.

The data related to the Financial and Legal identification form is kept for a maximum of 10 years after the last transaction of data related to the data subject (please refer to the relevant data protection notice [here](#)).

Audio and/or video recordings are stored in a FRA Equality, Roma and Social Rights Unit respective project library (which is accessible only to designated FRA staff) in FRA's data management system (DMS) for 6 months. In this respect, please see [FRA's privacy notice regarding the use of Microsoft Office 365](#).

9) Technical and organisational security measures (Article 31.1(g))

Please specify where/how the data are stored during and after the processing; please describe the security measures taken by FRA or by the contractor

How is the data stored?

- | | |
|----------------------------------|-------------------------------------|
| Document Management System (DMS) | <input checked="" type="checkbox"/> |
| FRA network shared drive | <input checked="" type="checkbox"/> |
| Outlook Folder(s) | <input checked="" type="checkbox"/> |
| CRM | <input type="checkbox"/> |
| Hardcopy file | <input type="checkbox"/> |
| Cloud (MS 365) | <input checked="" type="checkbox"/> |

Servers of external provider

If some of the activities are outsourced by FRA (for instance, flight and/or accommodation booking) some personal data might be stored on FRA's external contractors' servers, which are deemed to implement technical and security measures in accordance with the data protection clauses under the respective contracts.

10) Exercising the rights of the data subject (Article 14 (2))

How can people contact you if they want to know what you have about them, want to correct or delete the data, have it blocked or oppose to the processing? How will you react?

See further details in the Data Protection notice: e-mail to environment@fra.europa.eu

Data subject rights

- Right of access
- Right to rectification
- Right to erasure (right to be forgotten)
- Right to restriction of processing
- Right to data portability
- Right to object
- Notification obligation regarding rectification or erasure of personal data or restriction of processing
- Right to have recourse
- Right to withdraw consent at any time

Part 2 – Compliance check and risk screening (internal)