

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

NAME OF PROCESSING OPERATION²:

**Expert meeting on “Operational implications of the EU’s accession to ECHR for FRA work”
on 20-21 March 2025 in Vienna, Austria.**

Reference number: DPR-2020-235 (to be completed by the DPO)
Creation date of this record: 05/03/2025
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Part 1 (Publicly available)

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

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.

2) Who is actually conducting the processing? (Article 31.1(a))⁵

The data is processed by the **FRA itself**

For sharing and distributing documents, the Agency uses [MS365 cloud-based services](#) on the basis of the inter-institutional framework contract.

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).

The personal data are collected and processed to allow for the proper organisation of the Expert meeting on “Operational implications of the EU’s accession to ECHR for FRA work” on 20-21 March 2025 in Vienna, Austria.

The purpose of the processing of personal data is handling registration and attendance, reporting on the event, as well as taking appropriate event follow-up actions, such as sharing presentations among participants and feedback collection.

FRA, as the organiser of the event, carries out the following processing activities:

- handling registration and attendance;
- correspondence with participants;
- preparing of the agenda;
- event follow up actions such as event report, minutes, distribution of reports/minutes, feedback on reports;
- giving access to premises, providing catering;
- reimbursement of accommodation and travel expenses;
- sharing of presentations.

For identifying participants for the meeting, the FRA has also collected publicly available (internet) contact details such as email addresses, names, or surnames.

The shared experiences, views and answers you provide during the experts’ meeting will be used to draft FRA internal due diligence documents and guide for the particular research activities in ensuring the respect of fundamental rights in compliance with EU law and ECHR. The document and guide will be duly anonymised, used only for internal purposes and it will not be possible to link your views and answers to you or identify you in any other way.

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

For sharing and distributing documents, 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 part:

- MS Outlook
- MS Teams
- 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 mailbox (secsocialrights@fra.europa.eu) for centralising all email communication related to this event.

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

Whose personal data are being processed?

FRA staff attending the conference as participants or speakers

Non-FRA staff (experts invited)

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

Please tick all that apply and give details where appropriate

(a) General personal data

Personal details (name, surname, country, gender, civic title)

Contact details (email address, phone, mobile number)

Education & Training details

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

For participants for which FRA will reimburse travel and accommodation, the following data will also be collected:

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

- Legal entity form: date, place and country of birth, identity document number, personal identification number
- Supporting documents (e.g. invoices, tickets, etc.)

Family, lifestyle and social circumstances

Goods or services provided

Other (please give details):

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

The experts may inform FRA about sensitive personal data (such as food preferences for catering offered by FRA that may reveal religious beliefs, or limited information concerning health) that need to be taken into account for organising the expert meeting. Therefore, the following special categories of personal data might be processed/revealed by the information provided in this context:

Racial or ethnic origin

Political opinions

Religious or philosophical beliefs

Trade union membership

Genetic, biometric or data concerning health

Information regarding an individual's sex life or sexual orientation

N/A



(c) Personal data relating to criminal convictions and offences (Article 11)

Criminal record (or similar, e.g. declaration of good conduct)



N/A



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

A restricted number of staff members in charge of the organisation of the event can access the data (primarily Unit for Equality, Roma and Social Rights and Administration Unit)

Recipients **outside FRA:**

In case of reimbursement of costs to experts, their financial and/or legal identification forms including 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](#).

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

If yes, specify to which country:

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.

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.

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"?

Personal data collected by FRA for the organization of the meeting will be kept for a period of **one year after the event**, to ensure the implementation of follow-up activities. After that date, the data will be purged.

Special categories of personal data relating to dietary and/or access requirements will be deleted **as soon as they are no longer necessary** for the purpose for which they have been collected in the framework of the meeting but no later than 1 month after the end of the meeting.

The data related to the Financial and Legal identification forms 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](#)).

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 checked="" type="checkbox"/> |
| Hardcopy file | <input type="checkbox"/> |
| Cloud (MS 365) | <input checked="" type="checkbox"/> |
| Servers of external provider | <input type="checkbox"/> |

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: secsocialrights@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