

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

NAME OF PROCESSING OPERATION²: FRA selection procedure for the Pilot Youth Advisory Panel

Reference number: DPR-2020-229 (to be completed by the DPO)
Creation date of this record: 11/12/2024
Last update of this record:
Version: v.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 Unit Contact details: FRA-YouthAdvisoryPanel@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)

The following third parties are involved as processors:

The LimeSurvey software is stored in the SQL database hosted in the servers of the Agency's web hosting contractor Managing Innovation Strategies, SLL (MainStrat) in consortium with SARENET, S.A.U, located in Spain.

Moreover, FRA's web development contractor Eworx S.A. (Greece) may be also involved in the processing.

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

Why are the personal data being processed? Please provide a 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 Fundamental Rights Agency (FRA) aims to amplify the voices of young people across Europe. Therefore, our Director decided to establish a Youth Advisory Panel to ensure that a youth perspective is reflected in FRA's planning, work and other activities. In 2025 this activity will start with a two-year Pilot Panel that comprise seven young people aged 18 to 25 years (born in 1999 to 2006) with experience in civil society work and/or youth advocacy and who are citizens or legally residing in the EU or the accession countries (Albania, North Macedonia and Serbia) for at least two years prior to the submission of the application.

The purpose of the processing of your personal data is to organise the selection process of the members of FRA's Pilot Youth Advisory Panel; to manage applications at the various stages of this selection; to maintain and follow-up on the use of reserve list.

For the application process, FRA will use the LimeSurvey tool. Applicants will be asked to submit their CVs and motivation letter via LimeSurvey.

The Agency uses the LimeSurvey software according to the terms set out in a licence agreement. The data collected via LimeSurvey is stored in the SQL database hosted in the servers of the Agency's web hosting contractor.

FRA will hold video calls [via Teams](#) with a selected number of applicants as part of the selection procedure. More information on the selection process and the different activities can be found in the [Terms of Reference](#).

The processing by FRA of personal data of the selected applicants during the term of the Youth Advisory Panel will be covered by a separate data protection record.

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

Whose personal data are being processed?

- | | |
|---|-------------------------------------|
| FRA staff | <input type="checkbox"/> |
| Non-FRA staff (all applicants for FRA's Pilot Youth Advisory Panel) | <input checked="" type="checkbox"/> |

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 (name, surname, date of birth, gender, nationality(ies), citizenship, residence status) | <input checked="" type="checkbox"/> |
| Contact details (postal address, email address, mobile number) | <input checked="" type="checkbox"/> |
| Education & Training details | <input checked="" type="checkbox"/> |
| Employment details (work experience, languages, name and type of the employer/organisation, address of the employer/ organisation) | <input checked="" type="checkbox"/> |
| Financial details (financial identification form, bank account information) | <input type="checkbox"/> |
| Family, lifestyle and social circumstances (if revealed) | <input checked="" type="checkbox"/> |
| Goods or services provided | <input type="checkbox"/> |
| Other (please give details): | |

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

The following categories of personal data might be disclosed by the applicants during the selection process:

- | | |
|--|-------------------------------------|
| Racial or ethnic origin | <input checked="" type="checkbox"/> |
| Political opinions | <input checked="" type="checkbox"/> |
| Religious or philosophical beliefs | <input checked="" type="checkbox"/> |
| Trade union membership | <input checked="" type="checkbox"/> |
| Genetic, biometric or data concerning health | <input checked="" type="checkbox"/> |

Information regarding an individual's sex life or sexual orientation

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

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

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

During the selection process, a restricted number of staff members in charge of the selection, can access your personal data. These include designated staff in the Equality, Roma and Social Rights Unit, on a need-to-know basis, who are administering the procedure, including the Head of Unit, the Human Resources within the Administration Unit, the members from the selection committee for the Pilot Youth Advisory Panel, appointed through a decision of the Director, members of the Project team appointed by the Head of Unit, members of the Director's office and the Director of the Agency who is in charge of the final decision related to selections for the Pilot Panel.

Moreover, FRA staff members who are administrators of the LimeSurvey tool might have also access to registration information and user generated information.

Recipients **outside** FRA:

Moreover, restricted personnel of the Agency's web development contractor Eworx S.A might exceptionally have access to the host and usage information if required in case of technical issues.

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.

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 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.

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"?

Applications received via LimeSurvey from candidates submitting an application for membership of the Pilot Youth Advisory Panel are kept by FRA as follows:

a) For selected members of the Pilot Youth Advisory Panel, for two years equivalent to the term of office of the Pilot.

b) For candidates on the reserve list, for two years equivalent to the term of office of the Pilot Youth Advisory Panel.

c) For non-selected candidates, for 6 months after the call closure date.

Technically necessary cookies for LimeSurvey expire after 24 hours. If a cookie to prevent repeat responses is set, this expires after 1 year.

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

Other (please specify):

The LimeSurvey software is hosted in the servers of FRA's webhosting contractor, which, in accordance with the data protection clauses included in the contract signed with FRA, has in place technical and security measures are required under Regulation (EU) 2018/1725

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 FRA-YouthAdvisoryPanel@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