

**RECORD OF PROCESSING ACTIVITY  
ACCORDING TO ARTICLE 31 REGULATION 2018/1725<sup>1</sup>  
NOTIFICATION TO THE DATA PROTECTION OFFICER**

**NAME OF PROCESSING OPERATION<sup>2</sup>:** Call for proposal of sessions for the event “Fundamental Rights Forum 2021”, hereinafter “the Event”; taking place on 11-12 October 2021 in a hybrid setting.

Reference number: DPR-2021-125
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Part 1 (Publicly available)

<b>1) Controller(s)<sup>3</sup> of data processing operation (Article 31.1(a))</b>
Controller: European Union Agency for Fundamental Rights (FRA) Schwarzenbergplatz 11, A-1040 Vienna, Austria Telephone: +43 1 580 30 – 0 Contact: <a href="https://fra.europa.eu/en/contact">https://fra.europa.eu/en/contact</a> Organisational unit <b>responsible<sup>4</sup></b> for the processing activity: Communications and Events Unit. Contact: <a href="mailto:event@fra.europa.eu">event@fra.europa.eu</a> Data Protection Officer (DPO): <a href="mailto:dpo@fra.europa.eu">dpo@fra.europa.eu</a>

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

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

<sup>2</sup> **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.

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

<sup>4</sup> This is the unit that decides that the processing takes place and why.

<sup>5</sup> Is the FRA itself conducting the processing? Or has a provider been contracted?

TIPIK Communication Agency, which supports the call for proposal of sessions, and later on registration and the logistics of the organization of the hybrid event through a framework contract with DG SCIC and a specific contract with FRA.

Tipik Data Protection Officer (DPO): [gdpr@tipik.eu](mailto:gdpr@tipik.eu)

### 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).*

FRA is organising a call for sessions proposals inviting in a targeted way potential contributors to submit a proposal via the Forum 2021 website. These sessions will run in parallel during the Forum as live or recorded online events - panel debates, presentations, discussions, etc.

The call for proposals aims to open the floor and provide space for proposals of hybrid/virtual sessions by organisations from the human rights sector, civil society, social partners etc. These Forum sessions hosts/contributors are given the opportunity and the responsibility to implement single sessions or an entire strand of sessions.

Session hosts will be listed with their name in the Forum programme. Proposals for sessions are on 'invitation only' basis by the FRA, and to be detailed by potential contributors in the 'form for submitting proposals for sessions'.

The purpose of the processing of personal data is handling the call for proposal of sessions for the Fundamental Rights Forum taking place on 11-12 October.

Personal data will be collected through the following means:

Via the website: <https://fundamentalrightsforum.eu>

And by email : [FRA-RightsForum21@fundamentalrightsforum.eu](mailto:FRA-RightsForum21@fundamentalrightsforum.eu), visitors of the website can sign up for a pre-registration list and be first in line when registrations at the platform opens.

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

*Whose personal data are being processed?*

FRA staff

Non-FRA staff (session proposers, session co-contributors, organisations from the human rights sector, civil society, social partners, any European Citizen)

### 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)**

- |   |                                     |
|---|-------------------------------------|
| Personal details: Name, surname                       | <input checked="" type="checkbox"/> |
| Contact details: Email, phone number                  | <input checked="" type="checkbox"/> |
| Employment details: Affiliated organisation, position | <input checked="" type="checkbox"/> |
| Photo, biography                                      | <input checked="" type="checkbox"/> |
| Other:  | <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 (please specify which team and Unit)

*During the registration process, a restricted number of staff members, which are in charge of the event, can access your personal data. These include:*

- selected staff in the Communication & events unit and its Head of Unit;
- selected staff in the Institutional Cooperation and Networks Unit (INST);
- and selected staff in Technical Assistance and Capacity Building Unit (TACB);

Designated persons **outside** FRA: (please specify)

Selected staff from TIPIK Communication Agency [conference@tipik.eu](mailto:conference@tipik.eu) as the data processor, which supports the call for proposal of sessions and later on the registration and the logistics of the organisation of the hybrid event through a framework contract with DG SCIC and a specific contract with FRA.

7) Transfers to third countries or international organisations (Article 31.1 (e))<sup>6</sup>

*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

<sup>6</sup> **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.

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) EU-US Privacy Shield

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"?*

TIPIK Communication Agency will keep the collected data for no longer than until the date of 12 October 2022. After that date, the personal data collected via the mentioned website and by email will be purged/deleted from these systems.

Personal data related to the call for proposal of sessions will be retained by FRA for a maximum of one year after the end of the event, that is 12 October 2022.

Photos, audio and video recordings are stored in FRA Communication and events Unit drive for three years (being considered as FRA flagship event). Within this time, the files to be used for communication purposes and/or be archived for historical purposes shall be selected. The remaining files shall be deleted.

Information concerning the event on the FRA corporate website will be retained for 10 years.

#### 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?

- |                          |                                     |
|--------------------------|-------------------------------------|
| 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 (DMS)	<input checked="" type="checkbox"/>
Servers of external provider	<input checked="" type="checkbox"/>
Other (please specify): The data is stored in the EU and not transferred outside EU.	

## 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 privacy notice: e-mail to [event@fra.europa.eu](mailto:event@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)

### 11) Lawfulness of the processing (Article 5(a)–(e))<sup>7</sup>: Processing necessary for:

<sup>7</sup> Tick (at least) one and explain why the processing is necessary for it. Examples:

(a) a task attributed to your EUI by legislation, e.g. procedures under the staff regulations or tasks assigned by an Agency’s founding regulation. Please mention the specific legal basis (e.g. “Staff Regulations Article X, as implemented by EUI IR Article Y”, instead of just “Staff Regulations”)

(a2) not all processing operations required for the functioning of the EUIs are explicitly mandated by legislation; recital 17 explains that they are nonetheless covered here, e.g. internal staff directory, access control.