

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

**NAME OF PROCESSING OPERATION<sup>2</sup>: “Fundamental Rights Forum 2024”, hereinafter “the Event”;** taking place on 11-12 March 2024 in Vienna City Hall and online.

Reference number: DPR-2023-199
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**Part 1 (Publicly available)**

<b>1) Controller(s)<sup>3</sup> of data processing operation (Article 31.1(a))</b>
<p>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: Contact details: <i>Head of Unit Communications and Events</i>, <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></p>

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

<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?

For procuring the services to organize the event, the Agency made use of two of the European Commission DG SCIC's inter-institutional framework contracts. TIPIK and VIDELIO were selected as contractors and are FRA's processors. FRA has signed a contract with each of the two companies for this purpose.

1. **TIPIK Communication Agency SA** (TIPIK) [Avenue de Tervuren, 270,1150 Brussels, Belgium, +32.2.235.56.93] will be used for event management services and will support the registration to the event, travel, accommodation and the logistics.

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

For the implementation of the contract with TIPIK, the following sub-processors are used:

- Microsoft Azure Datacentre West Europe (Netherlands), which will provide cloud services to TIPIK in order to host the Fundamental Rights Forum website and TIPIK's own software UEvent. For more information about data hosting in Azure, please refer to the following link [here](#). For more information about Microsoft Azure Datacentre West Europe's contact details please refer to the following link [here](#).
- The travel agency Axon, which will process the personal data of the participants for which FRA will cover and organise the travel. See data protection notice [here](#).
- Interactive online application [Slido](#).
- [Big Blue Button](#) (BBB), which will process the personal data of participants when providing image and video connections services integrated in the networking application used during the event. Hetzner is the provider of the servers where the personal data processed by BBB is hosted. Please refer to [Hetzner Privacy Policy](#).
- [Matomo](#) for cookies online tracking.
- Onetec, badging system and emailing.

For accommodation organisation, TIPIK will share the name and surname of the participants with [magdas HOTEL Vienna City](#), [Hotel Rathauspark Wien](#), [Austria Trend Hotel Ananas](#) and [Hotel Europa Wien](#), which will act as separate controllers.

2. **VIDELIO**, [141 avenue des Grésillons,F - 92230 Gennevilliers, France], will provide technical support for audio-visual and conference technology, oversee live stream and recordings, floorplan design, and address all the technical needs for art performances.

VIDELIO's Data Protection Officer (DPO): Alain PESCH, [apesch@videlio-iec.com](mailto:apesch@videlio-iec.com)

### 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 purpose of the processing of personal data is for your attendance at the Fundamental Rights Forum 2024 – ‘Rights in motion: Embracing human rights for Europe’s future’ (hereinafter: the event), organized by FRA. The event takes place at Vienna City Hall (Rathaus) and will also be available for online viewing.

For the purposes of organizing this event, FRA will collect and process your personal data in order to carry out the following processing activities: registration of participants, organizing travel and accommodation arrangements, mailing lists of contacts, correspondence with speakers, moderators and participants, production of badges, preparing the event programme and sessions, audio and/or video recording / photographs of speakers, moderators and participants, as well as event follow up actions such as event report.

For the organization of the event, including the travel and accommodation as well as catering arrangements, FRA will collect from participants the personal data described in Section 5 below via the registration form sent by email. The collection of the registration data mentioned above will be managed by TIPIK using their own registration platform Uevent.

For identifying participants and speakers for the event, FRA has collected email addresses from participants of the FRA [Human Rights Leaders & Experts meeting in Rust on 7-8 September 2022](#), complemented by selected email addresses of FRA key stakeholders and networks who had in both cases consented to further communication and are part of FRA’s Customer Relationship Management system (CRM), see data protection notice [here](#).

IP address, connection details and cookies might be collected when connecting to the following online tools used during the event. Please refer to the relevant privacy statements for more information:

- The collection of registration data and email campaigns will be managed via UEvent software, which is a registration platform developed by TIPIK. Moreover, this platform uses Matomo, which is a cookies tracking tool. Please refer to the [Matomo Privacy Policy](#) for more information.
- To facilitate the networking of participants during the event, TIPIK has developed a networking application which integrates image and video connection services provided by [Big Blue Button](#). The networking application will collect personal data (name, surname, job position, organisation information and LinkedIn) of those participants who have given their consent in the registration form.
- Slido (for interaction with participation during the event). Participants will be able to access Slido via their devices (mobile phones or computers),

by scanning a QR code or by opening the slido.com page in their browsers. Registered participants will be able to participate by submitting questions and reactions via Slido. When using Slido, and submitting a question, participants will be asked to enter their first and last name (see [Slido privacy policy](#)). The use of the chat/comment tool remains entirely optional and can also be used anonymously (without entering first and last name) through Slido by visiting the Fundamental Rights Forum website.

- VSTREAM platform will be used for setting up the live streaming and will be hosted on [Fundamental Rights Forum website](#) via an IFRAME link. When clicking on the IFRAME link on the Forum website the viewers will automatically be redirected to the VSTREAM platform and the live streaming. Except for the IP connection, no other personal data is processed to access the live streaming. The sessions that are livestreamed will also be recorded for FRA output. Clear statements will be made that the session is being livestreamed and recorded by the moderators before starting. All participants will be asked to provide consent to the image and video recording in the registration form.

For the production of badges, the list of participants will be shared with the company Onetec (subcontractor of TIPIK), which will generate a QR code and send out a last email to all registered participants. Participants will be able to present the QR code at the registration desk, which will be scanned, allowing the production of the participants' badges.

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

*Whose personal data are being processed?*

- |   |                                     |
|---|-------------------------------------|
| FRA staff – participants to the event                                   | <input checked="" type="checkbox"/> |
| Non-FRA staff (taking part at the event either in presence or remotely) | <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

Personal details:

Name, surname, country, and city.

For those participants whose travel and accommodation arrangements will be organized and covered by FRA:

- Name, surname
- ID/Passport number
- ID/Passport expiration date
- ID/Passport country of delivery

Contact details:

Email address, mobile phone number.

Education & Training details:

Employment details:

Name and type of the employer/organisation, function/title, work city, work country.

Financial details:

Family, lifestyle and social circumstances:

Goods or services provided:

Other:

- Image, audio and/or video recordings of speakers and participants in the sessions that are livestreamed.
- A photo and short bio (including name, organisation) for speakers and moderators which will be uploaded on the events website and will be publicly available with the prior consent of the participants.
- IP addresses and/or cookies of participants and other metadata may also be collected by the online tools used to organise the event.

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

The personal data collected reveal:

Racial or ethnic origin:

The image, photo, and audio and video recordings of all participants, speakers and moderators, might incidentally reveal racial or ethnic origin.

Political opinions:

Religious or philosophical beliefs:

The image, photo, and audio, video recordings, and food preferences of the participants, speakers and moderators, might incidentally reveal religious beliefs.

Trade union membership:

Genetic, biometric or data concerning health:

Food preferences indicated by the participants in the registration form for the organization of the catering might reveal health conditions.

Limited information on health conditions (e.g., special accommodation required by participants with disabilities) that need to be taken into account for organising the event.

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

During the registration process, a restricted number of FRA staff members, which are in charge of the event, can access the personal data.

Designated persons **outside** FRA:

Designated staff-project team members of FRA's processors TIPIK and VIDELIO, which are bound by specific contractual and confidentiality clauses for any processing operation of participants' personal data on behalf of FRA deriving from Regulation (EC) 2018/1725.

Additionally, limited access to the data will also be granted to the service providers involved in the organisation of the event (as sub-processors or separate controllers), namely the travel agency Axon, the different online tools, and the hotels. Please refer to Section 2 above.

#### 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**

<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.

Yes

No

However, some of the sub-processors mentioned in section 4 (like Microsoft Azure and Slido), although having its data centers located in the EU, belong to US-based companies. Therefore, it cannot be completely discarded that some personal data, for example, diagnostic data, is transferred to the US. Moreover, US- based companies are subject to US Surveillance laws. In this regard, both processors are included in the 'Data Privacy Framework List' and therefore, any transfer to the US would be based on the [Commission Implementing Decision of 10.7.2023 on the adequate level of protection of personal data under the EU-US Data Privacy Framework.](#)

**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"?*

Personal data will be kept after the event to ensure the implementation of follow-up activities related to the event. Personal data related to participation (as indicated in section 2 above) will be retained by FRA for a period of 2 years after the event.



Information concerning the event on the FRA corporate website will be retained for five years. The FRA event report and visual outputs created based on the audio, video recordings and photographs will be retained on the Fundamental Rights Forum 2024 website and FRA corporate website for five years. TIPIK will keep the personal data for no longer than the date of 31 December 2024. After that date, the data will be purged.

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

Other (please specify): *TIPIK and Videlio Sharepoints when sharing and working on files*

*The cloud services provided to TIPIK are hosted in the Netherlands.*

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