

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

NAME OF PROCESSING OPERATION²: Event “29th FRA-National Liaison Officers meeting taking place on 20 and 21 October “

Reference number: DPR-2022-168
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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: Institutional Cooperation and Networks Unit Contact details: nlo@fra.europa.eu Data Protection Officer (DPO): dpo@fra.europa.eu</p>

2) Who is actually conducting the processing? (Article 31.1(a))⁵
<p>The data is processed by the FRA itself <input checked="" type="checkbox"/></p> <p>The data is processed also by a third party (contractor) [mention the third party] <input checked="" type="checkbox"/></p> <p>ProPager SARL supports the registration and the logistics of the organisation of the event through a framework contract with DG SCIC: FRAevent@propager.com</p>

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?

And additionally, sub-processors:

- For registration purposes: [Jotform](#) LTD
- For travel: the participant's full name and contact details (email address and phone number) will be shared with the travel agency and hotel: NEWS Travel SA. In exceptional situations (guests outside Schengen area flying with specific airline companies could be asked to provide their ID number and birth date to the travel agency)

Accommodation is at the [NH Hotel Belvedere](#), which will act as separate controller. For accommodation, the participant's full name will be shared with the hotel.

For the online access to the event, FRA uses the Video-conferencing software Cisco Webex.

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 your personal data is the organisation of the 29th FRA-National Liaison Officers meeting (hereinafter: the event), which will take place from 20 to 21 October 2022, at the FRA premises in Vienna in-person and virtually/online via Cisco Webex platform.

This includes the handling of the participant's invitation, registration and attendance and their travel and accommodation arrangements, ensuring security aspects, granting participants access to the venue and the online platform, minutes taking at the event, collection of feedback, collection of video/audio recordings of the event for the purpose of minutes-taking, as well as event follow-up actions, i.e. possible reimbursements of costs, sharing presentations among participants, reporting on the event. It includes, in particular, creation/sharing of participant lists, mailing lists of registrations and participants. Event evaluation will be done anonymously.

FRA is responsible for the overall organisation of the event and the communication with the participants before and after the end of the meetings.

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 (National Liaison Officers and alternates, government officials and observers invited to attend this event) | <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 (prefix, name, surname, gender, nationality (if required for travel arrangements))

Contact details (email address, mobile phone number, country of residence including city of departure and return)

Education & Training details

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

Financial details (e.g. financial identification form, bank account information, in exceptional cases if required for a reimbursement of expenses)

Family, lifestyle and social circumstances

Goods or services provided

Other (please give details):

Audio and/or Video recordings of the participants (for the sole purpose of minutes taking)

Questions, comments, and messages via chat (only for the purpose of minutes taking)

Voting and/or polling (if applicable)

Dietary requests and/or specific access requirements (if any)

(b) **Special categories of personal data** (Article 10). The personal data collected reveal:

Racial or ethnic origin

(Data revealing racial or ethnic origin as collected through video taking during the meeting (video taking for the sole purpose of minutes-taking).

Political opinions

Religious or philosophical beliefs

Trade union membership

Genetic, biometric or data concerning health (possibly revealed by dietary requests or specific access requirements)

(Data concerning health: data concerning health might be revealed by information on dietary requests or allergies or additional needs/specific access requirements, e.g. in case of disability (if any).

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)

N/A

Others:

IP address and connection details when connecting to Webex platform. Please refer to the respective [data protection notice](#).

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
restricted number of staff members in charge of the organisation of the event can access the data.

Recipients **outside** FRA:

ProPager SARL: FRAevent@propager.com

Jotform: gdpr@jotform.com

Agency NEWS Travel SA for travel and accommodation: FRAevent@propager.com

NH Hotel Belvedere: nhwienbelvedere@nh-hotels.com

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

Jotform LTD is based in the UK. Your personal data will be stored in servers in Germany. Standard Contractual Clauses are in place with this service provider. Additional

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.

safeguards (end-to-end encryption) are also in place. The data collected will not be transferred to the US. However, the Jotform mother company is US based, so personal data could in very rare cases be transferred to the United States if Jotform were to receive a demand for the data in connection with a judicial proceeding or a law enforcement request and where Jotform believes that they have to produce the data (Section 7 of the Data Processing Addendum signed by ProPager's DPO and Jotform).

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 implementing necessary follow up activities with regard to the purpose(s) of the processing of personal data as well as for its related management. Personal data related to registration and participation will be retained by FRA for a period of 6 months after the end of the event.

ProPager SARL will keep the participants list for no longer than the date of 31 January 2023. After that date, the registration data will be purged from Jotform and News Travel SARL.

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

Data necessary for financial purposes (reimbursement of expenses, etc.) are kept according to the rules set in the Regulation (EU, Euratom) 2018/1046.

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

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 (see FRA's privacy notice regarding the use of Microsoft Office)	<input checked="" type="checkbox"/>
Servers of external provider Jotform server based in Germany ProPager Server: WIMI	<input checked="" 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: e-mail to nlo@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