

## **29<sup>th</sup> FRA-National Liaison Officers event taking place on 20 and 21 October**

The European Union Agency for Fundamental Rights (FRA or Agency) processes the personal data of a natural person in compliance with Regulation 2018/1725 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/EC.

This data protection notice explains FRA's policies and practices regarding its collection and use of your personal data, and sets forth your privacy rights. We recognise that information privacy is an ongoing responsibility, and we will update this notice where necessary.

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## 1. Why do we collect personal data?

The purpose of the processing of your personal data is the organisation of the 29<sup>th</sup> 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/or 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, reporting on the event, such as sharing presentations among participants and feedback collection. It includes, in particular, creation/sharing of participant lists; mailing lists of registrations and participants. The event evaluation will be done anonymously.

## 2. What kind of personal data does the Agency collect?

We will collect only the following personal data necessary for the processing operation described above.

### General personal data:

- Personal details: name(s), surname, prefix, gender, and nationality (if required for travel arrangements)
- Contact details: email address, mobile phone number and country of residence (including city of travel departure and return)
- Employment details: role, function/title, name and type of the employer/organisation
- In exceptional cases if required for a reimbursement of expenses: financial identification form and bank account information
- Other:
  - Audio and/or video recording (only for the 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)
  - Travel and accommodation details: departure and arrival places and times, means of transport.
  - IP address and connection details when connecting to Webex platform.

### Special categories of personal data:

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

### **3. How do we collect your personal data?**

#### ***3.a. Information you provide us:***

For the registration to the event, possible reimbursement of expenses, and follow-up activities, such as reporting, audio/video recording of the event for the purpose of minutes taking, we collect and process the information and personal data you provide us by completing the online registration form (see Section 2 of this document).

The collection of the personal data and emails mailing during the registration will be managed via the software **Jotform online form creator** (Jotform's [Privacy Policy](#)).

For the event, FRA uses the Video-conferencing software Cisco Webex. Participants will be invited to register online for the event via an email sent to them by FRA:

- Registration to the event will be done using an online form created with Jotform;
- Online participants will be sent a link to the event, to be hosted using the Cisco Webex platform;
- Participants will be asked to provide their name, role and country that will show.
- The event will be live streamed (supported by a professional expert) in the FRA conference room and online for the on-line participants via Webex, so that in-person participants and online participants can interact.
- Regarding the processing of personal data by Cisco Webex Meetings service, please consult the dedicated Cisco Webex Meetings [data protection notice](#), which explains FRA's policies and practices regarding its collection and use of your personal data in the framework of Cisco Webex meetings.

If you participate online, by activating your camera and microphone you consent to the recording of your video and sound for the sole purpose of note taking. Furthermore, your audio and video will be audible and visible to the in-person participants to the meeting.

If you participate in person, FRA's conference room is equipped with video and sound system so that your audio and video will be audible and visible to the online participants to the meeting and will be recorded for the sole purposes of note taking.

By participating in the meeting, you consent to the above. You will be reminded during the registration process and at the beginning of the meeting of this information.

#### ***3.b. Information we collect about you:***

Your IP address and connection details are collected when connecting to Webex platform. Please refer to the Cisco Webex [data protection notice](#) for more information.

### **4. Who is responsible for processing your personal data?**

The Agency is the legal entity responsible for the processing of your personal data and determines the objective of this processing activity. The Head of the Institutional Cooperation and Networks Unit is responsible for this processing operation.

**ProPager SARL** ([FRAevent@newstravel.eu](mailto:FRAevent@newstravel.eu)) is the processor for this event. A contract between FRA and ProPager has been signed for this purpose (the contract). ProPager SARL is the contractor representing collectively NEWS Travel SA, ProFusion Sprl and Verhulst Events & Partners, SA.

For the implementation of the contract, ProPager uses the following sub-processors:

- For registration purposes: Jotform online form creator (sub-processor of ProPager-Eurojeune) used for the creation of the registration form, and the collection of registration data.
- For travel arrangements: the travel agency NEWS Travel SA

Accommodation is at the [NH Hotel Belvedere](#), which will act as separate controller.

## 5. Which is the legal basis for this processing operation?

The processing operations on personal data linked to the organisation, management, follow-up and promotion of the event are necessary for the management and functioning of the Agency. In this particular case, the legal base can be found in article 8 of the FRA [Founding Regulation \(EC\) No. 168/2007](#), as amended by [Regulation \(EU\) 2022/555](#) (the amended Founding Regulation). In its [Annual Work Programme 2022](#), FRA is tasked to meet with the National Liaison Officers under its project D.1.2. (Cooperation with Member States and with human rights and equality bodies at national level). Therefore, the processing is lawful under Article 5.1.(a) of the Regulation (EU) No 2018/1725.

In addition, the processing of the personal data is also in accordance with Article 5.1.(d) of Regulation (EU) No 2018/1725, based on the consent provided as regards the participation in the event (including sharing of the relevant data with the events organiser, the travel agency and the hotel for travel and accommodation arrangements), the audio and video recording of participants for minutes taking purposes.

The processing of special categories of personal data (information on dietary needs or allergies, or additional needs such as specific access requirements possibly revealing data concerning health) and video/audio recording (possibly revealing racial/ethnic origin) is lawful under Article 10(2)(a) of the same Regulation. Specific consent has been given and it is stored.

## 6. Who can see your data?

Access to your data is granted to authorised staff of FRA (restricted number of staff members in charge of the organisation of this event) and its contractor (ProPager SARL, designated staff-project team members), as well as the service providers involved in the organisation of the event, bound by confidentiality clauses, without prejudice to a possible transmission to the bodies in charge of a monitoring or inspection task in accordance with Union legislation. This includes Jotform, News Travel SA and the hotel (see section 4 above). Neither FRA nor its service providers share personal data with third parties for direct marketing.

## 7. Do we share your data with other organisations?

Personal data is processed by the Agency (including the processor and its sub-processors) only. In case that we need to share your data with third parties, you will be notified to whom your personal data has been shared with.

**8. Do we intend to transfer your personal data to Third Countries/International Organizations?**

No, the personal data of the participants to the event will not be transferred to Third Countries or International Organisations.

Jotform LTD is based in London, UK. Your personal data will be stored in a server in Germany. The data collected will not be transferred to the US. However, as Jotform's mother company is US based, 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. Nevertheless, Standard Contractual Clauses are in place with this service provider and the forms are encrypted.

**9. When we will start the processing operation?**

We will start the processing operation in September 2022.

**10. How long do we keep your data?**

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 and any related participant information for no longer than the date of 31 January 2023. After that date, the registration data will be purged entirely, including from Jotform and NEWS Travel.

Audio and/or video recordings are stored in a 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 6 months. In this respect, please see [FRA's privacy notice regarding the use of Microsoft Office 365](#). Information concerning the event on the FRA corporate website will be retained for five years

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

**11. How can you control your data?**

Under Regulation 2018/1725, you have rights we need to make you aware of. The rights available to you depend on our reason for processing your information. You are not required to pay any charges for exercising your rights except in cases where the requests are manifestly unfounded or excessive, in particular because of their repetitive character.

We will reply to your request without undue delay and in any event within one month of receipt of the request. That period may be extended by two further months where necessary, taking into account the complexity and number of the requests.

You can exercise your rights described below by sending an email request to [nlo@fra.europa.eu](mailto:nlo@fra.europa.eu).

### **11.1. The value of your consent**

Since your participation is not mandatory, we need proof that you consented to the processing of your personal data. Consent will be collected via the registration platform Jotform. You have the right to withdraw your consent at any time, and we will delete your data or restrict its processing. All processing operations up until the withdrawal of consent will still be lawful.

### **11.2. Your data protection rights**

#### **a. Can you access your data?**

You have the right to receive information on whether we process your personal data or not, the purposes of the processing, the categories of personal data concerned, any recipients to whom the personal data have been disclosed and their storage period. Furthermore, you can have access to such data, as well as obtain copies of your data undergoing processing.

#### **b. Can you modify your data?**

You have the right to ask us to rectify your data you think is inaccurate or incomplete at any time.

#### **c. Can you restrict us from processing your data?**

You have the right to restrict the processing of your personal data. If you do, we can no longer process them, but we can still store them. In some exceptional cases, we will still be able to use them (e.g. with your consent or for legal claims). You have this right in a few different situations: when you contest the accuracy of your personal data, when the Agency no longer needs the data for completing its tasks, when the processing activity is unlawful, and finally, when you have exercised your right to object.

#### **d. Can you delete your data?**

You have the right to ask us to delete your data when the personal data are no longer necessary for the purposes for which they were collected, when you have withdrawn your consent or when the processing activity is unlawful. In certain occasions we will have to erase your data in order to comply with a legal obligation to which we are subject.

We will notify to each recipient to whom your personal data have been disclosed of any rectification or erasure of personal data or restriction of processing carried out in accordance with the above rights unless this proves impossible or involves disproportionate effort from our side.

#### **e. Are you entitled to data portability?**

Data portability is a right guaranteed under Regulation 1725/2018 and consists in the right to have your personal data transmitted to you or directly to another controller of your choice.

In this case, this does not apply for two reasons: I) in order for this right to be guaranteed, the processing should be based on automated means, however we do not base our processing on any automated means; II) this processing operation is carried out in the public interest, which is an exception to the right to data portability in the Regulation.

**f. Do you have the right to object?**

When the legal base of the processing is “*necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Union institution or body*” which is the case in most of our processing operations, you have the right to object to the processing. In case you object, we have to stop the processing of your personal data, unless we demonstrate a compelling reason that can override your objection.

**g. Do we do automated decision making, including profiling?**

Your personal data will not be used for an automated decision-making including profiling.

**12. What security measures are taken to safeguard your personal data?**

The Agency has several security controls in place to protect your personal data from unauthorised access, use or disclosure. We keep your data stored on our internal servers with limited access to a specified audience only.

**13. What can you do in the event of a problem?**

- a) The first step is to notify the Agency by sending an email to [nlo@fra.europa.eu](mailto:nlo@fra.europa.eu) and ask us to take action.
- b) The second step, if you obtain no reply from us or if you are not satisfied with it, contact our Data Protection Officer (DPO) at [dpo@fra.europa.eu](mailto:dpo@fra.europa.eu).
- c) At any time you can lodge a complaint with the EDPS at <http://www.edps.europa.eu>, who will examine your request and adopt the necessary measures.

**14. How do we update our data protection notice?**

We keep our data protection notice under regular review to make sure it is up to date and accurate.

**END OF DOCUMENT**