

Workshop on forced returns monitoring in Athens, Greece, on 22-23 January 2024

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 process personal data?

We collect the personal data of experts invited to and participating in the workshop on forced returns monitoring. The activity takes place in Athens, Greece, on 22 and 23 January 2024 and is organised under the project “Greek Ombudsman actions for strengthening good governance, accountability and combating maladministration in the public sector”, funded by the EEA and Norway Grants. The workshop is jointly organised by the Greek Ombuds Institution (Project promoter) and the FRA (project partner).

In this context, the FRA, as project partner, will process personal data to arrange travel and accommodation for some of the experts participating in the workshop.

2. What kind of personal data does the Agency process?

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

(a) General personal data:

- Personal details: civic title, first name, surname, gender. For organising travel and accommodation, participants may be required to provide data of birth, nationality, ID or passport number to FRA or to FRA’s travel agency. Collecting such data might be necessary in those cases to comply with the national and international laws applicable to travels and air carriers.
- Contact details: e-mail address, phone, mobile phone numbers (optional),
- Employment details: function/title, name, and type of the employer/organisation.

(b) Special categories of personal data:

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

3. How do we collect and process your personal data?

Via email correspondence with experts invited to the workshop and/or with the experts’ employer we collect personal data to allow FRA to organize the travel and accommodation of experts participating in person in the workshop.

3a. Information you provide us:

For the organization of the workshop, including the travel and accommodation, FRA and its travel agency AMEX (as FRA’s processor) might collect from you the personal data described in section 2 above via email correspondence and via the travel agency online booking tool “Neo” (more information can be found in [this data protection notice](#)). Through email correspondence with the experts or the experts’ employer, FRA will be provided with the information required to book flight and accommodation.

Should you inform FRA about the sensitive personal data mentioned above, your consent to the processing will be requested by email.

3b. Information we receive from other sources:

FRA receives the names and contact details of the experts participating in the workshop from their respective employers.

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 Institutional Cooperation and Networks Unit is responsible for this processing operation.

Moreover, the third party indicated above might also process your personal data, acting as FRA's data processors (processing data on behalf of FRA). Please refer to the [respective data protection notice](#).

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

The processing operation is necessary for the performance of the tasks carried out by the Agency in the public interest to achieve the objectives set out in its Work Programme and are necessary for the management and functioning of the Agency. In particular, Article 6.1 (b) of the FRA Founding Regulation (Council Regulation (EC) No. 168/2007 establishing a European Union Agency for Fundamental Rights as amended by Regulation (EU) 2022/555) foresees the organisation of meetings of experts in the Member States as one of FRA's working methods to carry out its activities. The project is included in the 2024 Single Programming Document, position F.1.2.

Therefore, the processing is lawful under Article 5.1.(a) of the Regulation (EU) No 2018/1725.

The processing of the special categories of personal data described in Section 2 b) is lawful under Article 10. (2)(a) of the same Regulation, as specific consent is given by the data subjects, and it is stored.

6. Who can see your data?

A restricted number of FRA staff responsible for organising the experts' travel and accommodation has access to your personal data as described in Section 2 above. Assigned staff from Corporate Services (Digital Services) might have access to some personal data necessary to provide technical support.

Moreover, restricted staff of FRA processors, which are bound by specific contractual clauses for any processing operations of experts' personal data on behalf of FRA, and by the confidentiality obligations deriving from Regulation (EC) 2018/1725) might have access to some personal data as indicated in the respective data protection notices referred to above.

7. Do we share your data with other organisations?

Personal data is processed by the Agency (including the processors). 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.

9. When will we start the processing operation?

We will start the processing operation in January 2024.

10. How long do we keep your data?

Information and personal data collected by FRA in the context of the travel and accommodation organisation of the experts invited to this workshop will be kept for one year after the workshop. Personal data collected by FRA's contractor AMEX will be kept in accordance with the retention period indicated in the respective [data protection notice](#).

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 onEEANG@fra.europa.eu

11.1. The value of your consent

The processing of special categories of personal data described in Section 2 b) above will be based on your consent, which will be requested from you.

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. Access to the MS Teams cloud is achieved via a secure connection.

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 onEEANG@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.

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.

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