

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

NAME OF PROCESSING OPERATION²: Use of Meetergo as a booking tool within the framework of a contract to develop FRA's internal and external communication strategies

DPR-2023-178 (to be completed by the DPO)
Creation date of this record: 09/03/2023
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Version: 1

1) Controller(s)³ of data processing operation (Article 31.1(a))
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: Corporate Services Unit Contact details: HR@fra.europa.eu Data Protection Officer (DPO): dpo@fra.europa.eu

2) Who is actually conducting the processing? (Article 31.1(a))⁵
The data is processed by FRA itself <input checked="" type="checkbox"/>
The data is processed by a third party contractor (Restless Communications Ltd.) under a specific contract for services concluded by FRA to develop an internal and external communication strategy. This contractor uses a platform, Meetergo , to enable

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?

the consulted stakeholders to book their interview based on pre-defined available appointment slots

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 data processing is to enable to stakeholders identified by FRA who will be consulted on FRA's internal and external communication activities to book a suitable time for their interview with the external contractor running the communication strategies project.

Stakeholders will be invited by an email sent by FRA (Communication & Events Unit and Corporate Services Unit) to visit the contractor's page and choose the most suitable timeslot for their interview in the Meetergo booking tool integrated in Restless Communications Ltd. website.

4) Description of the categories of data subjects (Article 31.1©)

Whose personal data are being processed?

FRA staff

Non-FRA staff: Other identified stakeholders interviewed in the context of the project on enhancing FRA's communication

5) Categories of personal data processed (Article 31.1(c))

Please tick all that apply and give details where appropriate. Include information if automated decision making takes place, evaluation and monitoring

(a) General personal data

Personal details: name, surname

Contact details: email address

Other: Cookies

Meetego uses optional cookies *which do not collect any personal data*. The collection of such cookies can be disabled in most web browsers. Please find information on the cookies used here: [Privacy Policy "Cookies"](#).

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

Political opinions	<input type="checkbox"/>
Religious or philosophical beliefs	<input type="checkbox"/>
Trade union membership	<input type="checkbox"/>
Information regarding an individual's sex life or sexual orientation	<input type="checkbox"/>
(c) Personal data relating to criminal convictions and offences (Article 11)	<input type="checkbox"/>

6) Recipient(s) of the data (Article 31.1 (d))⁶

*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 in COMMS and CS (HR Sector) responsible for the implementation of the specific contract (only the sending of emails to stakeholders)

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

The name and email address will be accessible to the contractor under the contract with FRA, with whom the interview is booked. Meetergo processes data on behalf of the contractor, based on a licence agreement.

7) Transfers to third countries or recipients outside the EEA (Article 31.1 (e))⁷

If the personal data are transferred outside the European Economic Area, this needs to be specifically mentioned, since it increases the risks of the processing operation.

Data are transferred to third country recipients:

Yes

No

⁶ No need to mention entities that may have access in the course of a particular investigation (e.g. OLAF, EO, EDPS).

⁷ **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.

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"?

Meetergo defines within their policy "at least 6 to 10 years" as retention period of the data collected. However, as data controller, FRA will ensure via the contractor that the data will be only kept for the period required to fulfil the purpose for which it is collected. CS Unit will undergo the necessary steps to ensure the deletion of data by the expiry of the specific contract signed with Restless Communication.

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

FRA DMS

Outlook Folder(s)

CRM

Hardcopy file (in locked safes)

Cloud

Servers of external provider

Other (please specify: Meetergo's servers are located in Frankfurt, Germany. For more information Meetergo's privacy statement is available here: [Privacy Policy | meetergo - Conversion Platform](#))

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?

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)–(d))⁸: Processing necessary for:
Mention the legal basis which justifies the processing and assess that the purposes specified are purposes specified, explicit, legitimate.

⁸ 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.

(b) a specific legal obligation to process personal data, e.g. obligation to publish declarations of interest in an EU agency's founding regulation.

(c) this is rarely used by the EUIs.

(d) if persons have given free and informed consent, e.g. a photo booth on EU open day, optional publication of photos in internal directory;

(e) e.g. processing of health information by first responders after an accident when the person cannot consent.