

Consultation, cooperation and meetings with Member States' National Liaison Officers (NLOs) including the organisation of FRA-NLO Meetings

The European Union Agency for Fundamental Rights (FRA) 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 privacy 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?

We collect and maintain personal data of a contact group list entitled “National Liaison Officers” within FRA to support the cooperation and consultation of the Agency with this specific stakeholder.

National Liaison Officers (NLOs) are officially appointed to FRA as primary contact for their Member States. The contact group list, which includes NLOs, alternate and other operational contacts aims to:

- facilitate the interactions and exchange of information on activities between FRA and Member State governments, ministries and other national authorities through the NLOs;
- allow the organisation of meetings (in persons, virtual or hybrid) to inform NLOs about FRA work;
- allow FRA to organise the travel and accommodation of NLOs participating at the FRA-NLO meeting and/or the payment/reimbursement of the related costs in line with the FRA [mission guide](#);
- facilitate the consultation of Member States through the NLOs on the FRA Programming document, FRA Annual Report, FRA External evaluation and other thematic consultations for FRA projects and activities;
- facilitate the organisation of online information sessions and/or webinars for ministries and other national authorities to present FRA tools and upcoming reports;
- allow FRA to send to NLOs additional information related to news, activities about FRA and its work, as well invitation to meetings or events of relevance for NLOs and/or Member States;
- support the regular exchange of communication by telephone or emails with NLOs about FRA work in compliance with the provisions in the Founding Regulation.

In line with the principle of transparency, NLOs are informed by FRA, following their nomination by their Member States, that the name and affiliated ministry of NLOs and alternate members shall be made public and shall be updated by the Agency on its web site for the duration of their function as NLO/alternate member.

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

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

(a) General personal data:

- Personal details: civil title, first name and surname. For organising travel and accommodation in the context of FRA-NLO meetings, participants might be required to provide date of birth, ID or passport number to FRA or to FRA’s external contractor responsible for the organization of the meeting. 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 numbers (as optional), postal address
- Employment details: function/title, name and type of the employer/organisation

- Financial details: financial identification form, bank account information only when FRA organises the reimbursement of travel to join the FRA-NLO meetings.
- (b) Other:
- Information regarding the appointment of NLOs as EU Charter Focal Point or FREMP delegate in the Council of the EU, as this is of relevance to FRA work.
 - Image, messages, chat, questions, FRA documents, audio and/or video recordings of the participants in case meetings take place online or in a hybrid format, or audio-recording in case of face-to-face meetings for the purposes of minutes taking.
 - Image, messages, chat, questions, FRA documents, audio and/or video recordings of the participants to the FRA online information sessions when recording of the session is specifically indicated in the invitation.
 - IP addresses and/or cookies of participants and other metadata may also be collected by the online tool used in case the meetings take place online or in a hybrid format.
- (c) Special categories of personal data
- Racial or ethnic origin and/or religious or philosophical beliefs might be incidentally revealed by the image and video recording in case of online or hybrid meetings, when participants switch on their cameras.
 - Food preferences indicated by the participants might reveal health conditions, religious beliefs, etc. (only in the context of catering and/or dinners offered during in person meetings organised by FRA).
 - Limited information on health conditions (like special accommodations required by persons with disabilities) that need to be taken into account for organising the venue of NLOs to a FRA meeting.

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

3a. Information you provide us

For the organization of the NLOs meetings, including the travel and accommodation as well as catering arrangements, FRA or its processors (namely, the external contractor used by FRA to organize the meeting) might collect from you the personal data described in section 2 above via the registration to the meeting.

Through a registration form, you will provide FRA with information allowing us to book your flight and accommodation namely civil title, name and surname, telephone, email, passport number (only for those coming by flight), data of birth (only for those coming by flight), address, function, organisation name, meals and accessibility requirements.

3b. Information we collect about you

For sharing and distributing documents, the Agency uses the following cloud based services on the basis of the inter-institutional framework contract for the provision of M365 services, of which the Agency is a part:

- MS Teams.
- FRA DMS SharePoint to maintain FRA master list of NLOs contacts and centralise documentations related to the day-to-day management of NLOs by the relevant unit in FRA.
- The NLO mailbox (nlo@fra.europa.eu) for centralizing all email communications related to the FRA cooperation with NLOs.

Therefore, some personal data (mainly metadata and diagnostic data) might be collected from you and processed by such applications as indicated in FRA's MS365 [data protection notice](#).

Other online tools/systems used for the sharing of files, and/or online consultation or scheduling meetings which FRA or its contractors might use for the purposes of communicating with you or organizing meetings might also collect and process some personal data (such as IP addresses, cookies, metadata or information about your device). In particular, FRA uses:

- [LimeSurvey](#) (professional online survey tool, also used for registration to NLO meetings)
- [Webex](#) for online/hybrid NLO meetings and FRA online information sessions for national authorities.

In case other tools/systems are used by FRA or its contractors for specific meetings or other purposes, you will be informed accordingly via the invitation to the meeting or the registration form.

3c. Information we receive from other sources

Upon NLOs official nomination, the relevant ministry or national authority provides FRA with the contact information of the appointed NLO (name, address, e-mail addresses, and phone number, title and function).

After receipt of the information on their nomination, the Agency informs NLOs about their role, an overview of activities concerned by NLOs and that their contact details (name, organisation, NLO function) will be published on FRA's website to comply with the Agency's transparency obligations.

For supporting the cooperation with NLOs and regular contacts, FRA centralises NLOs names, contacts details and affiliated organisation in an Excell list on DMS Sharepoint accessible to restricted number of FRA Staff directly in charge with the daily management of the cooperation with NLOs.

Depending on its needs, the Agency might have recourse to external contractors for the organization of the NLO meetings. In such case, specific information about the processing of personal data by such contractors will be provided together with the invitation to the respective meeting.

4. Who is responsible for the 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 & Networks Unit is responsible for this processing operation.

Moreover, the third parties indicated above might also process your personal data, acting as FRA's data processors (processing data on behalf of FRA) or as separate controllers (please refer to the respective data protection notices).

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 its goal to ensure close cooperation with Member States through NLOs, pursuant to Article 8(1) 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). Therefore, the processing operation is lawful under Article 5.1.(a) of the Regulation (EU) No 2018/1725.

Therefore, the processing operation is lawful in accordance with Article 5.1.(b) of Regulation (EU) 2018/1725.

Image, message, chat, questions, FRA documents, audio and/or video of the NLOs interventions may be recorded in case meetings take place online, in a hybrid format and also in case of face-to-face meetings, based on the scope of NLOs' consent. Therefore, the processing operation is lawful under art. 5(1)(d) of the Regulation (EU) No.2018/1725.

The processing of special categories of personal data (incidental, such as racial or ethnic origin, religious or philosophical beliefs, or non-incident, such as personal data concerning health) 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 the NLOs activities has access to your contact details. A restricted number of staff in Corporate Services (Finance Sector) has access to the financial data when the reimbursement of travel and accommodation expenses is necessary. Assigned staff from Digital Services (Corporate Services) might have access to some personal data necessary to provide technical support.

NLOs emails and contact details are shared internally with FRA staff to facilitate contacts between FRA and the respective NLOs for the purpose of the cooperation.

In case of reimbursement of costs for travels to NLOs, financial or legal identification forms are transferred to the European Commission (DG Budget) in order to validate data subjects' details in the European Union's accounting system ABAC. Data is processed in this regard in line with FRA's data protection notice [here](#) .

Moreover, restricted staff of FRA contractors, which are bound by specific contractual clauses for any processing operations of NLOs' 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 besides information included in this notice, 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.

However, the transfer of limited personal data (diagnostic data) outside the EU and EEA might occur when using MS Teams and other online tools/systems mentioned above to perform the tasks related to the NLOs participation in FRA activities. We refer to the respective data protection notices for more information.

9. When will we start the processing operation?

We will start the processing operation in October 2023.

10. How long do we keep your data?

We keep NLOs' data for the duration of their role as National Liaison Officer or alternate plus one year.

Information and personal data collected by FRA in the context of the organisation of meetings (namely, list of participants) will be kept for one year after the meeting. Personal data collected by FRA's contractors in the context of meeting will be deleted after the end of the respective specific contract.

Information and personal data collected by FRA in the context of consultations with the NLOs will be retained until one year after the end of the consultation.

The data related to the Financial and Legal identification form is kept for a maximum of 10 years after the last transaction of data related to the data subject (please refer to the relevant data protection notice [here](#)).

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.

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.

11.1. The value of your consent

Although FRA processes the data on the basis of the public interest and its legal obligation regarding NLOs (see Section 5 above), in case meetings take place online, in a hybrid format and also in case of face-to-face meetings, image, message, chat, questions, FRA documents, audio and/or video of the NLOs interventions may be recorded based on the scope of NLOs' consent.

Moreover, the processing of special categories of personal data (incidental, such as racial or ethnic origin, religious or philosophical beliefs, or non-incidental, such as personal data concerning health) will also 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 unauthorized access, use or disclosure. We keep your data stored on computer systems with limited access to specified personnel 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: nlo@fra.europa.eu.
- 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 privacy notice?

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

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