

**RECORD OF PROCESSING ACTIVITY  
ACCORDING TO ARTICLE 31 REGULATION 2018/1725<sup>1</sup>  
NOTIFICATION TO THE DATA PROTECTION OFFICER**

**NAME OF PROCESSING OPERATION<sup>2</sup>: FRA website and web services**

DPR-2018-025 (to be completed by the DPO)
Creation date of this record: 21/12/2018
Last update of this record: 03/11/2020
Version:3

<b>1) Controller(s)<sup>3</sup> of data processing operation (Article 31.1(a))</b>
Controller: European Union Agency for Fundamental Rights (FRA) Organisational unit <b>responsible<sup>4</sup></b> for the processing activity: Communications & Events Contact person: Nicole Romain <a href="mailto:nicole.romain@fra.europa.eu">nicole.romain@fra.europa.eu</a> Data Protection Officer (DPO): Robert-Jan Uhl <a href="mailto:dpo@fra.europa.eu">dpo@fra.europa.eu</a>

<b>2) Who is actually conducting the processing? (Article 31.1(a))<sup>5</sup></b>
The data is processed by the FRA itself <input checked="" type="checkbox"/>
The data is processed also by a third party (contractor) [mention the third party] <input checked="" type="checkbox"/>
Framework hosting contractor consortium, MainStrat, Sarnet and Bilbomatica has access to the MariaDB database. Contact point at external third party (e.g. Privacy/Data Protection Officer): <i>Guillermo Lafarga / Project Manager / MainStrat</i> <a href="mailto:glafarga@mainstrat.com">glafarga@mainstrat.com</a>

<sup>1</sup> <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32018R1725>

<sup>2</sup> **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.

<sup>3</sup> In case of more than one controller (e.g. joint FRA research), all controllers need to be listed here

<sup>4</sup> This is the unit that decides that the processing takes place and why.

<sup>5</sup> Is the FRA itself conducting the processing? Or has a provider been contracted?

Framework web development contractor Eworx.

Contact point at external third party (e.g. Privacy/Data Protection Officer):

*Chris Condos / Project Manager / Eworx cc@eworx.gr*

### 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).*

#### 1a. Cookies

We use cookies on our website. A cookie is a small piece of data that a website stores on the visitor's computer or mobile device.

We use first-party cookies for the technical functioning of the website and, if you consent to it, to collect your browsing experience on our website for anonymised statistics, whose purpose is to improve our communication and the service we offer.

You can find in this page the option to [manage your consent](#).

In order to watch a FRA video on our website, a message will alert you that you need to accept YouTube third-party cookies to do so. [YouTube](#) has its own cookie and privacy policies over which we have no control. There is no installation of cookies from YouTube until you consent to YouTube cookies.

#### 1b. Analytics

Apart from the cookie based analytics described above FRA also collects anonymised statistics from server logs.

#### 2a-2e. Subscribed users

The main purposes are (i) to enable FRA to provide the subscribed users with services in regard to access to documents, and (ii) to provide a more personalised service via e-mail alerts and a contact form.

For access to documents see the **Privacy notice on Access to documents** on the [Data Protection page](#).

For information related to the contact form see the **Privacy notice on Registration of incoming emails and letters (FRA Infobox)** on the [Data Protection page](#).

For email alerts a user may subscribe to the service and select different areas of FRA's work for which they wish to receive information. The user must create an account with

a username and password. To change the account settings or to delete the account the user must login.

If there has been no update to the user settings for 12 months the user will be sent an email asking them to confirm their subscription by logging in. If the user doesn't log in within 14 days of receiving this email then their account will be deleted.

#### 4) Description of the categories of data subjects (Article 31.1(c))

*Whose personal data are being processed?*

FRA staff	<input checked="" type="checkbox"/>
Non-FRA staff (FRA website users)	<input checked="" type="checkbox"/>

#### 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*

##### 1a Cookies

##### First-party cookies for the technical functioning of the website

This website is run on the Drupal content management system (CMS). Drupal sets some cookies in order to improve the user experience and assist in the delivery of the site (e.g. to test whether a user has JavaScript enabled.) The following cookies are set by Drupal on this site:

Cookie name	Domain	Expires / Max-Age	Purpose
fs	fra.europa.eu	Session	Stores the font size that the user has selected.
has_js	fra.europa.eu	Session	Informs the content management system whether you have javascript enabled in your browser settings. It can deliver content in a suitable way depending on your settings. It expires when you close the browser.
eu_cookie_consent	.europa.eu	Session	Informs the content management system whether you have consented

to accept aggregated analytics cookies and YouTube cookies.

### First-party cookies used by Matomo Analytics

We use Matomo web analytics to monitor and evaluate the effectiveness and efficiency of the FRA website.

Matomo is an open-source analytics platform which fully is controlled by FRA. This platform enables the protection of end-user personal data thanks to features such as IP address de-identification. On top of that, the FRA has created a feature to manage users' consent to the collection of users' browsing experience for anonymised statistics.

Cookie name	Domain	Expires / Max-Age	Purpose
_pk_id.	fra.europa.eu	13 months	To track whether a user is new to the site or a repeat visitor.
_pk_ses.	fra.europa.eu	30 minutes	To track which pages were visited

### Data protection information and measures in Matomo

Matomo is configured to store first-party cookies.

Cookies (from Matomo) enable FRA to track the following information about visitors. We use this information to prepare aggregated, anonymous statistics reports of visitors' activity:

- IP address (with 2 bytes masked)
- Location: country, region, city, approximate latitude and longitude (Geolocation)
- Date and time of the request (visit to the site)
- Title of the page being viewed (Page Title)
- URL of the page being viewed (Page URL)
- URL of the page that was viewed prior to the current page (Referrer URL)
- Screen resolution of user's device
- Time in local visitor's time-zone
- Files that were clicked and downloaded (Download)
- Links to an outside domain that were clicked (Outlink)
- Pages generation time (the time it takes for webpages to be generated by the webserver and then downloaded by the visitor: Page speed)
- Main language of the browser being used (Accept-Language header)
- Browser version, browser plugins (PDF, Flash, Java, ...) operating system version, device identifier (User-Agent header)
- Language of the visited page
- Campaigns
- Site Search

FRA retains full control of the data collected through first-party cookies by storing the data in servers fully owned and controlled by the Agency itself.

Besides some session cookies, a random ID persistent cookie is generated by Matomo, which allows FRA to identify when a user returns to the site. This cookie has an expiration date of 13 months, after which it is automatically removed from the user's device.

### Third-party cookies used by YouTube

In order to watch a FRA video on our website, a message will alert you that you need to accept YouTube third-party cookies to do so.

Cookie name	Domain	Expires / Max-Age	Purpose
1P_JAR	.google.com	1 month	Collects website statistics and tracked conversion rates.
CONSENT	.google.com	20 years	This cookie is used to save the user's preferences and other information. This includes in particular the preferred language, the number of search results to be displayed on the page as well as the decision as to whether the Google SafeSearch filter should be activated or not.
DV	www.google.com	7 minutes	This cookie is used to save the user's preferences and other information. This includes in particular the preferred language, the number of search results to be displayed on the page as well as the decision as to whether the Google SafeSearch filter should be activated or not.
GPS	.youtube.com	1 day	Registers a unique ID on mobile devices to enable tracking based on geographical GPS location.
IDE	.doubleclick.net	1 year	Used by Google DoubleClick to register and report the website user's actions after viewing or clicking one of the advertiser's ads with the purpose of measuring the efficacy of an ad and to present targeted ads to the user.
NID	.google.com	6 months	Registers a unique ID that identifies a returning

			user's device. The ID is used for targeted ads.
PREF	.youtube.com	8 months	Registers a unique ID that is used by Google to keep statistics of how the visitor uses YouTube videos across different websites.
VISITOR_INFO1_LIVE	.youtube.com	179 days	Tries to estimate the users' bandwidth on pages with integrated YouTube videos.
YSC	.youtube.com	Session	Registers a unique ID to keep statistics of what videos from YouTube the user has seen.

### Consent to collecting your browsing experience for anonymised statistics and for viewing YouTube videos

By default, the browsing experience of our website visitors is **NOT** tracked by FRA nor by any third-party. You may, though, choose to consent to contributing your browsing experience on our website for us to produce anonymised statistics or to accepting third-party cookies to enable you to watch embedded YouTube videos on our website.

If you enable the *Do Not Track* option (see below for an explanation) in your web browser, we will respect your choice and your browsing experience on our website will not be tracked for our anonymised statistics.

If you have not enabled the *Do Not Track* option, we will provide you with a cookie banner to make your choice and install a cookie called "eu\_cookie\_consent" to keep track of your choice. If you provide consent Matomo is activated and some relevant cookies are loaded. You can always decide to withdraw your consent or consent again at any time on the [Cookies page](#).

The "eu\_cookie\_consent" is a session cookie: if you close your browser and if your *Do Not Track* option is not enabled, you will be prompted with the cookie banner again to renew your choice.

In case you have disabled all cookies, you will be prompted with the cookie banner at each visit of our website.

### Do not track preferences

*Do Not Track* is a function that allows visitors not to be tracked by websites. Do Not Track options are available in a number of browsers including:

[Firefox](#)

[Internet Explorer](#)

[Chrome](#)

[Safari](#)

### 1b Analytics

Apart from the above cookie based analytics, log data is stored for 54 weeks. A list of log data used by Matomo can be found on the [Matomo developers guide](#).

**2a. Applicants for vacancies, selections or traineeships**

User name, address, contact details, date of birth, gender, nationality, languages, education and qualifications, work history. For more information see the **Privacy notice - Selection procedure for traineeships** and the **Privacy Notice - Selection procedures for TAs CAs and SNEs** on the [Data Protection page](#).

**2b. Subscribers to e-mail alerts**

Name, e-mail address.

**2c. Users who request access to documents**

Name, address, contact details. For more information see the **Privacy Notice – Access to documents** on the [Data Protection page](#).

**2d. Users who take part in online surveys or consultations**

Varies according to survey. For more details, see the specific Information notes accompanying the surveys and consultations, which can be found on the starting page of each online survey or consultation and also on the [Data protection page](#);

**2e. Users who wish to get in contact with FRA via the Contact form**

Email address.

6) Recipient(s) of the data (Article 31.1 (d))<sup>6</sup>

*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?*

Designated **FRA** staff members (please specify which team and Unit)

*The online communications teams as well as the project manager from the Comms and events Unit.*

Designated persons **outside** FRA:

*Certain employees working with FRA from the hosting framework consortium.*

*Certain employees working with FRA from the web development contractor.*

*Both contractors sign a standard Data Protection clause and process data within the EU.*

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

7) Transfers to third countries or recipients outside the EEA (Article 31.1 (e))<sup>7</sup>

*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

**If yes, specify to which country:**

**If yes, specify under which safeguards:**

Adequacy Decision of the European Commission

Standard Contractual Clauses

Binding Corporate Rules

Memorandum of Understanding between public authorities

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"?*

**1a Cookies**

See section 5 for list of cookies and max age of each cookie.

**1b Analytics**

Matomo log data – 180 days

Web server log data – 54 weeks

**2a. Applicants for vacancies, selections or internships**

<sup>7</sup> **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.



5 years

**2b. Subscribers to e-mail alerts**

1 year

**2c, 2d, 2e Other subscribed users**

Varies – see the individual Information notes for details on the [Data Protection page](#).

**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
- Outlook Folder(s)
- CRM
- Hardcopy file
- Cloud (give details, e.g. cloud provider)
- Servers of external provider

Other (please specify):

*External contractor under the provisions of a framework contract.*

*FRA undertakes to ensure security updates to the software and hosting environment take place in a timely manner.*

*The hosting consortium has security policies in place to ensure the physical and logical security for the infrastructure it operates. The consortium has also performed a security self-assessment to demonstrate the compliance of its Data Centre with the security requirements outlined by the ISO 27001 standard. Added to this, the following sub-sections show the specific security measures at three levels:*

- 1. FRA Platform environment, by means of 2 Fortinet firewalls.*
- 2. FRA Applications, by means of Frontal Pro Web Application Firewall.*
- 3. Physical security in the Data Center.*

**10) Lawfulness of the processing (Article 5(a)–(d))<sup>8</sup>: Processing necessary for:**

<sup>8</sup> 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

*Mention the legal basis which justifies the processing*

- (a) a task carried out in the public interest or in the exercise of official authority vested in the FRA (including management and functioning of the institution)
- (Examples of legal basis: FRA Founding Regulation (EC) No. 168/2007 establishing the European Union Agency for Fundamental Rights Articles 4.1 a) and 4.1 c); FRA legal acts (Conditions of Employment, Staff Rules, Administrative Circular etc.)
- (b) compliance with a legal obligation to which the FRA is subject
- (c) necessary for the performance of a contract with the data subject or to prepare such a contract
- (d) Data subject has given consent (ex ante, explicit, informed)
- Consent is collected via clicking on a button to accept cookies, ticking a check box to agree to a linked privacy policy for the contact form, vacancy applications, newsletter subscription and access to documents form.
- (e) necessary in order to protect the vital interests of the data subjects or of another natural person

**11) Data Minimisation(Article 4(c))**

*Do you really need all data items you plan to collect? Are there any you could do without?*

The processed personal data will be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

**12) Transparency (Article 14)**

*How do you inform people about the processing operation?*

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.

*The data subjects are informed Via a pop-up banner, information page and Privacy Notice to data subjects which is available on the FRA website.*

### 13) 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 to have access                                     | <input checked="" type="checkbox"/> Anytime [or specify the timeframe] |
| Right to rectify   | <input checked="" type="checkbox"/> Anytime [or specify the timeframe] |
| Right to erase ("right to be forgotten)                  | <input checked="" type="checkbox"/> Anytime [or specify the timeframe] |
| Right to restrict of processing                          | <input checked="" type="checkbox"/> Anytime [or specify the timeframe] |
| Right to data portability                                | <input checked="" type="checkbox"/> Anytime [or specify the timeframe] |
| Right to object  | <input checked="" type="checkbox"/> Anytime [or specify the timeframe] |
| Right to obtain notifications to 3 <sup>rd</sup> parties | <input checked="" type="checkbox"/> Anytime [or specify the timeframe] |
| Right to have recourse                                   | <input checked="" type="checkbox"/> Anytime [or specify the timeframe] |
| Right to withdraw consent at any time                    | <input checked="" type="checkbox"/> Anytime [or specify the timeframe] |

### 14) Other linked documentation

*Please provide links to other documentation of this process (consent form, privacy notice, project documentation, security related policies /measures etc.)*

Privacy Notice

Responsible  
Head of Communications & Events Unit  
Nicole Romain  
[nicole.romain@fra.europa.eu](mailto:nicole.romain@fra.europa.eu)

Signature

Date