

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

NAME OF PROCESSING OPERATION²: Expert workshop on civic space monitoring and protection from 16 to 18 September 2024, in Vienna, Austria

| |
|--|
| Reference number: DPR-2024-221 |
| Creation date of this record: 21 June 2024 |
| Last update of this record: |
| Version: 1 |

Part 1 (Publicly available)

| |
|---|
| 1) Controller(s)³ of data processing operation (Article 31.1(a)) |
| <p>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: Interinstitutional Cooperation and Networks Contact details: civicspace@fra.europa.eu Data Protection Officer (DPO): dpo@fra.europa.eu</p> |

| |
|---|
| 2) Who is actually conducting the processing? (Article 31.1(a))⁵ |
| <p>The data is processed by the FRA itself <input checked="" type="checkbox"/></p> <p>The data is processed also by a third party (contractor) <input checked="" type="checkbox"/></p> <p>For the online registration of participants, FRA uses the online tool LimeSurvey, which is hosted in the servers of the Agency's webhosting contractor.</p> |

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?

For sharing and distributing documents, the Agency uses [MS365 cloud-based services](#) on the basis of the inter-institutional framework contract

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 personal data are collected and processed to allow for the proper organisation of one expert **workshop** (hereinafter: the event) in the framework of the C.1.6. project Civic space and national rule of law dialogues, envisaged in the [2024 Annual Work Programme](#) of the FRA. The event will take place in person, at the FRA premises in Vienna, Austria, from 16 to 18 September 2024.

The purpose of the processing of personal data is handling registration and attendance, reporting on the events, as well as taking appropriate event follow-up actions, such as sharing presentations among participants and feedback collection.

More specifically, FRA, as the organiser, carries out the following processing activities:

- Contacting potential participants and speakers for the event, whose contact details are already included in FRA's Customer Relationship Management system (CRM), see data protection notice [here](#), or whose contact details are obtained by the relevant institution/organization they work for;
- Creation of mailing lists of contacts;
- handling registration and attendance;
- correspondence with speakers, moderators and participants;
- preparing of the programme and sessions;
- event follow up actions such as event report, minutes, distribution of reports/minutes, feedback on reports;
- giving access to premises, providing catering;
- reimbursement of accommodation and travel expenses;
- sharing of presentations.

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 part:

- MS Outlook
- MS Teams
- FRA DMS SharePoint to maintain FRA list of invited experts and participating experts and any other workshop documents such as agenda, background documents or minutes
- The FRA Civic Space mailbox (civicspace@fra.europa.eu) for centralizing all email communications related to this expert workshop.

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

Whose personal data are being processed?

FRA staff participating in the meeting

Non-FRA staff (representatives from Civil Society Organisations, IGOs, EU Institutions, NHRIs and other authorities)

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

Please tick all that apply and give details where appropriate

(a) General personal data

Personal details:

Name, surname, gender, nationality, address.

For participants for which FRA will reimburse travel and accommodation, the following data will also be collected:

- Financial details: financial identification form and bank account information for those experts who receive reimbursement of travel/accommodation expenses
- Legal entity form: date, place and country of birth, identity document number, personal identification number
- Supporting documents (e.g. invoices, tickets, etc.)

Contact details: email address

Education & Training details

Employment details (name and type of the employer/organisation)

Financial details (e.g. financial identification form, bank account information)

Family, lifestyle and social circumstances

Goods or services provided

Other (please give details):

- IP addresses and/or cookies and other metadata of participants registering online for the event may also be collected by the online tool used for registration, LimeSurvey. In this particular case, the use of cookies by LimeSurvey will be automatically disabled.

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

Participants are asked to indicate in the registration form their food preferences (for the organisation of the catering) and whether they have special accessibility requirements so the necessary accommodations can be organised. Therefore, the following special categories of personal data might be processed/revealed by the information provided in this context:

Racial or ethnic origin

| | |
|---|-------------------------------------|
| Political opinions | <input type="checkbox"/> |
| Religious or philosophical beliefs | <input checked="" type="checkbox"/> |
| Trade union membership | <input type="checkbox"/> |
| Genetic, biometric or data concerning health | <input checked="" type="checkbox"/> |
| Information regarding an individual's sex life or sexual orientation | <input type="checkbox"/> |
| N/A | <input type="checkbox"/> |
| (c) Personal data relating to criminal convictions and offences (Article 11) | |
| Criminal record (or similar, e.g. declaration of good conduct) | <input type="checkbox"/> |
| N/A | <input checked="" type="checkbox"/> |

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

*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
(From the Institutional Cooperation and Networks Unit and Corporate Services Unit – Financial Sector)

A restricted number of FRA staff from the above Units involved in the organisation of the events has access to your personal data as described in Section 5 above.

Recipients **outside** FRA:

In case of reimbursement of costs to experts, their financial and/or legal identification forms including supporting documents 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](#).

7) Transfers to third countries or international organisations (Article 31.1 (e))⁶

⁶ **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.

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

Transfer outside of the EU or EEA

- Yes
- No

If yes, specify to which country:

Transfer to international organisation(s)

- Yes
- No

If yes specify to which organisation:

Legal base for the data transfer

- Transfer on the basis of the European Commission's adequacy decision (Article 47)
- Transfer subject to appropriate safeguards (Article 48.2 and .3), specify:
- a) A legally binding and enforceable instrument between public authorities or bodies.
- Standard data protection clauses, adopted by
- b) the Commission, or
- c) the European Data Protection Supervisor and approved by the Commission, pursuant to the examination procedure referred to in Article 96(2) .
- d) Binding corporate rules, Codes of conduct , Certification mechanism pursuant to points (b), (e) and (f) of Article 46(2) of Regulation (EU) 2016/679, where the processor is not a Union institution or body.

Subject to the authorisation from the European Data Protection Supervisor:

- Contractual clauses between the controller or processor and the controller, processor or the recipient of the personal data in the third country or international organisation.
- Administrative arrangements between public authorities or bodies which include enforceable and effective data subject rights.
- Transfer based on an international agreement (Article 49), specify:

Derogations for specific situations (Article 50.1 (a) –(g))

- N /A
- Yes, derogation(s) for specific situations in accordance with article 50.1 (a) –(g) apply
In the absence of an adequacy decision, or of appropriate safeguards, transfer of personal data to a third country or an international organisation is based on the following condition(s):

- (a) The data subject has explicitly consented to the proposed transfer, after having been informed of the possible risks of such transfers for the data subject due to the absence of an adequacy decision and appropriate safeguards
- (b) The transfer is necessary for the performance of a contract between the data subject and the controller or the implementation of pre-contractual measures taken at the data subject's request
- (c) The transfer is necessary for the conclusion or performance of a contract concluded in the interest of the data subject between the controller and another natural or legal person
- (d) The transfer is necessary for important reasons of public interest
- (e) The transfer is necessary for the establishment, exercise or defense of legal claims
- (f) The transfer is necessary in order to protect the vital interests of the data subject or of other persons, where the data subject is physically or legally incapable of giving consent
- (g) The transfer is made from a register which, according to Union law, is intended to provide information to the public and which is open to consultation either by the public in general or by any person who can demonstrate a legitimate interest, but only to the extent that the conditions laid down in Union law for consultation are fulfilled in the particular case

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"?

Information and personal data collected by FRA in the context of the organisation of the event will be kept for one year after conclusion of the expert workshop.

If information concerning the event is published on the FRA corporate website, it will be retained for five years.

Special categories of personal data relating to dietary and/or access requirements will be deleted as soon as they are no longer necessary for the purpose for which they have been collected in the framework of the meeting but no later than 1 month after the end of the meeting.

Personal data relating to the Financial and Legal identification forms 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 for the Agency's expenditure operations [here](#)).

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?

Document Management System (DMS)



| | |
|------------------------------|-------------------------------------|
| FRA network shared drive | <input checked="" type="checkbox"/> |
| Outlook Folder(s) | <input checked="" type="checkbox"/> |
| CRM | <input checked="" type="checkbox"/> |
| Hardcopy file | <input type="checkbox"/> |
| Cloud (MS 365) | <input checked="" type="checkbox"/> |
| Servers of external provider | <input checked="" type="checkbox"/> |

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?

See further details in the Data Protection notice: e-mail to civicspace@fra.europa.eu

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