

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

NAME OF PROCESSING OPERATION²: Event “Fundamental Rights Dialogue 2”, hereinafter “the Event”; taking place on 23 February 2021 in a virtual setting.

Reference number: DPR-2021-118
Creation date of this record: 08/01/2021
Last update of this record: 28/01/2021
Version: 1

Part 1 (Publicly available)

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 Contact: https://fra.europa.eu/en/contact Organisational unit responsible⁴ for the processing activity: Communications and Events Unit 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 the FRA itself <input checked="" type="checkbox"/>
The data is processed also by third parties (Processors) <input checked="" type="checkbox"/>

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?

MCI Benelux S.A., which supports the registration and the logistics of the organization of the virtual event through a framework contract with DG SCIC and a specific contract with FRA.

MCI Brussels Contact: gdpr-brussels@mci-group.com

And additionally, sub-processors:

- [Aventri \(support@aventri.com\)](mailto:support@aventri.com)
- [KUDO \(support@kudoway.com\)](mailto:support@kudoway.com)
- [Slido \(support@slido.com\)](mailto:support@slido.com)
- [Video Booth Systems](#)
- Microsoft 365 (Outlook, Hosting of MCI files)

Sub-processor platforms that collect personal data that may be used by participants, but will not collect data on behalf of FRA are:

- YouTube (livestream simulcast)
- Facebook (livestream simulcast)

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).

FRA is responsible for the overall organisation of the event, the communication with the speakers and participants before and after the end of the event, as well as communication and promotion of the event.

The purpose of the processing of personal data is handling registration and attendance, identify and invite plenary speakers, reporting on the event, as well as event follow-up actions, such as sharing presentations among participants and feedback collection. It includes, in particular, lists and mailing lists for contacts, invitations, participants, reports, minutes, distribution of reports/minutes, feedback on reports, meeting follow-up, photographs/pictures, presentations, audio and/or video recording of speakers and participants, news and publications.

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

- For **participation to dialogue, a “virtual streamed session”**, registration will be optional. During the registration, data collected will be name, surname, age range and email address (required), whereas organization, role and country will be optional.
- For **all those recording a 1 minute video via the “online video booth”**, a dedicated consent form will provide information related to the collection, use and storage of their personal information and information. (See [template](#))

Virtual streamed session: Most participants will be simply watching the livestream. Registered participants will receive a specific link to watch the livestream, where they are able to also engage with the organisers via Slido. Through the Slido tool, they will be able to request 'to take the floor'. When a participant has been selected to 'take the floor', they will be taken to a 'virtual backstage room', prior to being taken to the live event (broadcasting studio). If the participant is taken to the broadcasting studio, audio and/or video broadcast will be streamed live and a recording will be made. Clear statements will be made that the session is being livestreamed and recorded before joining the broadcasted session. The organizer (MCI) will ensure that the participant gave their consent prior to allowing them access to the broadcasting studio.

Those participants only joining via Slido will be able to submit questions via the Slido interface. Slido will request them to provide their first and last name ([privacy policy](#)).

A private web player is being provided, in order to not to drive people to watch the livestream on YouTube or Facebook.

Simulcasted sessions: Simulcasting will be provided to Youtube, Facebook and potentially other channels. The chat and comment on the YouTube and Facebook Live streams will remain available on demand. Users can manage those comments themselves via their profile. YouTube Chat & Comments: Those who want to engage with the Chat (Live) functionality, should be aware that using the YouTube live chat whilst being logged in with a regular Gmail account, will mean that the user's real name will be shown. This can be changed in the display settings of your account ([direct link](#)).

Registration: During the registration process to the public session. Please note that registration to the open session will be optional.

Registered participants will connect to the livestream via specific link sent to them prior to the event going live. The private web player embedded on the page where these registered participants will follow the livestream, does not collect personal data.

Personal data will be collected through the following means:

- **Video booth:** For speakers of virtual videos, personal data in line with this record for processing will be collected through Video Booth Systems, in order to record and edit pre-recorded one-minute videos ([consent form](#)).
- Registered participants will be able to engage with the organisers and the FRA Director and Moderator by submitting questions and requesting to 'take the floor' by using **Slido**. When using Slido, participants will be requested to input their First and Last Name.
- The registered participants requesting to 'take the floor' and that are selected will be invited to connect to the 'backstage area' and the broadcasted 'stage', both virtual meeting rooms manager via the **KUDO** web conferencing system.
 - The server is on the Amazon Web Services infrastructure for hosting the KUDO platform. AWS is a global cloud service provider with data centers all over the world. KUDO's primary data center in Europe is in Frankfurt, and the secondary one is in Ireland. AWS does not replicate across regions by default, and KUDO adheres to data residency requirements of customers. See document from AWS that specifically discusses this ([AWS_Answers_to_Key_Compliance_Questions - Data Location](#)).
 - The KUDO core sub-processors are applicable (KUDO - List of Sub-processors). Only to be taken into account are the KUDO core sub-

processors. No personal data is actually collected by the sub-processors.



AWS_Answers_to_Key AWS - List of
_Compliance_Question Sub-processors.pdf

- All data in the platform – in transit or at rest – is encrypted using the latest and most secure encryption algorithm (AES-128 and AES-256), using client's own encryption key: End-to-end encryption (E2EE), dedicated SSL, IP Whitelisting, and regional cloud infrastructure based on client's compliance needs.
- All the (personal) data will remain in EU servers. The data collected via is IP address, first name, last name, or the screen name, email address.
- Recordings are not stored on the KUDO platform directly. When a meeting is requested to be recorded, MCI requests to KUDO that a meeting is recorded. The meeting will then be recorded and uploaded to our secured storage area on the EU servers.
- The collection of registration data and email campaigns will be managed via the software **Aventri**. The system uses essential cookies and cookies to improve your website experience and to generate anonymous, aggregate user statistics. Aventri does not do anything with the data apart from storing it for the Contractor (MCI Benelux S.A). Event reminder emails and a post-event follow up email will be sent through Aventri ([cookie policy](#)). The only cookies that will be collected during the registration process for this event are:
 - PHPSESSID: Retains session state of a user activity (1st Party – Session Cookie)
 - Regtoken: To track cookie consent of all essential cookies (1st Party – Session Cookie)
 - selectedlanguage: Track chosen Language (1st Party – Expires in 1 day)
 - cookieconsent_status: Track cookie consent of essential cookies (1st Party – Expires in 12 months)

Neither of these cookies can read or access other cookies or any data from a user's hard drive. Further, neither of these cookies alone will personally identify a user; however, a cookie will recognize a user's individual web browser or device through an IP Address, browser version, operating system and other information.
- Recordings: Recordings will be downloaded and saved to the MCI servers (Microsoft, Ireland based servers). MCI will share the recordings with FRA via its filesharing solutions which is a Microsoft "Ytransfer" solution from Office 365.

During the livestream on YouTube Live, the participants' comments and feedback in the chat during the open session will be enabled. By using the live chat and/or comments functionalities, the users agrees with the [YouTube terms and conditions](#). The use of the chat/comments tool remains fully optional. by visiting the event micro-website, hosted via the webserver of one.com ([cookie policy](#)). The website uses the following first-party cookies:

Domain	Name	Value	Expires on
fra.mci-events.eu	uncodeAI.css	800x600@16	session
fra.mci-events.eu	uncodeAI.images	1032	session
fra.mci-events.eu	uncodeAI.screen	800	session
fra.mci-events.eu	uncode_privacy[conse...	%5B%5D	2021-06-09 09:50:39Z

Additionally website analytics will also be collected via Fathom, which anonymizes visitors through complex hashes. Fathom does not use cookies ([data policy](#)).

Viewer analytics for the web player and different simulcasts livestreams will be collected and analysed. None of this data will be able to be traced back to individuals.

Anonymised information on participation to the live streamed event (e.g. number of persons, country location, duration) will be used ([YouTube privacy policies](#)). This information will be used only for FRA internal purposes to make an evaluation of the event.

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

Whose personal data are being processed?

FRA staff – participants to the event

Non-FRA staff (speakers, public audience, any European Citizen)

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

Please tick all that apply and give details where appropriate

(a) General personal data (add or delete as appropriate – the data in the brackets are only examples)

Personal details: Name, surname, email address, age range (for all)

Contact details e.g. role, affiliated organisation (mandatory only for speakers and one-minute-videos):

Image, audio and/or video recordings of speakers and one-minute-videos

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 (please specify which team and Unit)

During the registration process, a restricted number of staff members, which are in charge of the event, can access your personal data. These include:

- selected staff in the Communication & events unit and its Head of Unit;
- selected staff in the Institutional Cooperation and Networks Unit (INST);
- and selected staff in Technical Assistance and Capacity Building Unit (TACB);

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

Selected staff at the data processor is MCI Benelux S.A., which supports the registration and the logistics of the organisation of the virtual event through a framework contract with DG SCIC and a specific contract with FRA.

Selected staff at the livestream provider CAS AV, will receive access to speakers' information in order to setup technical rehearsal calls and to help speakers connect to the livestream.

The video booth supplier, Videobooth Systems Limited, will have access to the speakers name, email address, organisation and recordings.

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

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) EU-US Privacy Shield

Transfer subject to appropriate safeguards (Article 48.2 and .3), specify:

- a) A legally binding and enforceable instrument between public authorities or bodies.

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.

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"?

MCI Benelux S.A. will keep the participants list for no longer than until the date of 1 May 2021. After that date, the personal data collected via Aventri, KUDO and Slido will be purged/deleted from these systems.

Personal data will be kept after the Event to ensure implementing necessary follow up activities with regard to the purpose(s) of the processing of personal data as well as for its related management.

Personal data related to registration and participation will be retained by FRA for a maximum of one year after the end of the event, which is 23 February 2022.

Photos, audio and video recordings are stored in FRA Communication and events Unit drive for three years (being considered as FRA flagship event). Within this time, the files to be used for communication purposes and/or be archived for historical purposes shall be selected. The remaining files shall be deleted.

Information concerning the event on the FRA corporate website will be retained for 10 years.

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 | <input checked="" type="checkbox"/> |
| Outlook Folder(s) | <input checked="" type="checkbox"/> |
| CRM | <input type="checkbox"/> |
| Hardcopy file | <input type="checkbox"/> |
| Cloud (DMS) | <input checked="" type="checkbox"/> |
| Servers of external provider | <input checked="" type="checkbox"/> |
| Other (please specify): | |

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 privacy notice: e-mail to event@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

Part 2 – Compliance check and risk screening (internal)

11) Lawfulness of the processing (Article 5(a)–(e))⁷: Processing necessary for:

Mention the legal basis which justifies the processing and assess that the purposes specified are purposes specified, explicit, legitimate.

⁷ 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.