

RECORD OF PROCESSING ACTIVITY

**ACCORDING TO ARTICLE 31 REGULATION 2018/1725¹
NOTIFICATION TO THE DATA PROTECTION OFFICER**

NAME OF PROCESSING OPERATION²: “Fundamental Rights Forum 2021”, hereinafter “the Event”; taking place on 11-12 October 2021 in a hybrid setting.

Reference number: DPR-2021-135
Creation date of this record: 01/02/2021
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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 Contact: https://fra.europa.eu/en/contact Organisational unit responsible⁴ for the processing activity: Contact details: <i>Head of Unit Communications and Events</i>, event@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 third parties (Processors) <input checked="" type="checkbox"/></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?

TIPIK Communication Agency, which supports the call for proposal of sessions, registration and the logistics of the organisation of the hybrid event through a framework contract with DG SCIC and a specific contract with FRA.

Tipik's Data Protection Officer (DPO): gdpr@tipik.eu

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

- Microsoft Teams
- B2Match (registration and event platform)
- Sli.do
- Vimeo,
- Abbit bv
- Restless Communications Ltd

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 processing of personal data is handling registration and attendance to the 2021 Fundamental Rights Forum, identify and invite plenary speakers and participants, 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.

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

Whose personal data are being processed?

- | | |
|---|-------------------------------------|
| FRA staff – participants to the event | <input checked="" type="checkbox"/> |
| Non-FRA staff (taking part at the event either in presence or remotely) | <input checked="" type="checkbox"/> |

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

Please tick all that apply and give details where appropriate

Virtual streamed session: Registered participants will access the live stream on the B2Match platform, where they are able to also engage with the session organisers via Slido. Clear statements will be made that the session is being livestreamed and recorded before joining the broadcasted session. The organiser (Tipik) will ensure that the participant gave their consent prior to allowing them access to the broadcasting studio. Participants will be informed before each session that if they do not wish to be filmed or broadcasted they will have to mute themselves and turn off their cameras.

- Recordings: Recordings will be downloaded and saved to the TIPIK servers (Microsoft, Ireland based servers) and ABBIT servers (Microsoft, based in Belgium). ABBIT will share the recordings with FRA via its filesharing solutions which is wetransfer.com.

During the livestream on Vimeo and Teams, the participants' comments and feedbacks in the chat will be disabled. By using the live chat and/or comments functionalities, the users agree with the Vimeo terms and conditions. The use of the chat/comments tool remains fully optional through Slido by visiting the event platform, hosted via the web servers of Slido.com (<https://www.sli.do/cookie-policy>).

Anonymised 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 (Vimeo privacy policies). This information will be used only for FRA internal purposes to make an evaluation of the event.

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](#)).

Simulcasted sessions: Simulcasting will be provided to Teams and Vimeo; Youtube (from FRA) and Facebook (from FRA). FRA can allow the chat and comment on the YouTube and Facebook Live streams as 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 participants' account ([direct link](#)).

Registration: Please note that registration to the online sessions will be needed. Registered participants will connect to all sessions via specific links made available to them on the B2Match platform on the days of the Forum.

Personal data will be collected through the following means:

- Registered participants will be able to engage with the session organisers, Speakers and the Moderator by submitting questions by using Slido. When using Slido, participants will be requested to input their First and Last Name.
- The collection of registration data and email campaigns will be managed via the software B2Match. B2Match does not do anything with the data apart from storing it for the Contractor (TIPIK Communication Agency).

(a) General personal data

Personal details: First Name, Name, Email address, Organisation name, Organisation type and Organisation Description, Country and City (for all as mandatory fields to be filled)

Contact details e.g. Job Position, Website, Organisation Logo, State Province, Zip Code and Address (for all as optional fields):

Contact details e.g. Mobile Phone Number, Biography and Photo (only for Speakers and Moderators)

Image, audio and/or video recordings of speakers, participants taking part in the online sessions, participants of the physical sessions and highlights videos

Dietary requirements, physical disabilities requiring assistance onsite, personal data for the organisation of travels and accommodation for participants taking part at physical sessions

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

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:

Selected staff from TIPIK Communication Agency conference@tipik.eu as the data processor, which supports the call for proposal of sessions, the registration and the logistics of the organisation of the hybrid event through a framework contract with DG SCIC and a specific contract with FRA.

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

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

Some of the sub-processors are U.S.-based companies. As advised by the EDPS in its opinion on online event management at EACEA (Case 2020-1199), we will collect the consent of the data subjects, after having informed them of the possible risks of such transfers for the data subject due to the absence of an adequacy decision and appropriate safeguards. Such consent on transfer will be given by a clear affirmative act, event-specific and documented. The legal base of the data transfer is thus consent as per Article 50(1)(a) of Regulation (EU) 1725/2018.

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.

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.

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"?

TIPIK Communication Agency will keep the participants list for no longer than until the date of 31 December 2021. After that date, the personal data collected via B2Match, 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 12 October 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 checked="" 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

[REDACTED]

[REDACTED]

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.