

**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>:** Roma survey 2024

Reference: DPR-2024-216 (to be completed by the DPO)
Creation date of this record: 23/05/2024
Last update of this record:
Version: v1

<b>1) Controller(s)<sup>3</sup> of data processing operation (Article 31.1(a))</b>
<p>Controller: European Union Agency for Fundamental Rights (FRA) Schwarzenbergplatz 11, A-1040 Vienna, Austria</p> <p>Telephone: +43 1 580 30 – 0</p> <p>Contact person: <a href="mailto:contact@fra.europa.eu">contact@fra.europa.eu</a></p> <p>Organisational unit <b>responsible<sup>4</sup></b> for the processing activity: Research &amp; Data Unit Equality, Roma and Social Rights Unit</p> <p>Contact details: <a href="mailto:romasurvey2024@fra.europa.eu">romasurvey2024@fra.europa.eu</a></p> <p>Data Protection Officer (DPO): <a href="mailto:dpo@fra.europa.eu">dpo@fra.europa.eu</a></p>

<b>2) Who is actually conducting the processing? (Article 31.1(a))<sup>5</sup></b>
<p>The data is processed by the FRA itself <input type="checkbox"/></p> <p>The data is processed by a third party <input checked="" type="checkbox"/></p>

<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?

Ipsos NV, FRA's contractor, selected following a public procurement procedure, is acting as the processor.

Contact point at external third party

Project Co-ordinator *Sara Grant-Vest* / [sara.grant-vest@ipsos.com](mailto:sara.grant-vest@ipsos.com)

In each of the countries covered by the survey, the following polling agencies will act as sub-processors:

Ipsos Bulgaria, Ipsos Greece, Ipsos Ireland, Ipsos Italy, Ipsos Portugal, Ipsos Romania, Ipsos Spain, Ipsos Albania, Ipsos North Macedonia, Ipsos Serbia, Effience3 France, Tarki Social Research Institute Hungary, Institute of Sociology of the Czech Academy of Science Czechia.

In addition, Ipsos NV will use iField platform to carry out survey fieldwork. The third party providing the platform is Novatel EOOD Sofia (Bulgaria), hosted by Equinix in Sofia (Bulgaria).

### 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 the personal data is to collect comparable data in 13 survey countries (ten EU Member States – BG, CZ, EL, ES, FR, HU, IE, IT, PT, RO; three accession countries – AL, MK and RS) to support the EU in protecting the fundamental rights of persons with Roma or Travellers background. The survey (using the contractor's services) will collect data on respondents' household situation, their experiences of discrimination in the areas of employment, health, housing, education and other services, experiences of hate crime and rights awareness. All personal data received by FRA and Ipsos NV have been previously anonymised by sub-processors to (1) further check on data quality during field work (2) to produce indicators and results to provide evidence on the situation of fundamental rights.

Starting from June 2024, the contractor, using the national polling agencies (local sub-processors in the survey countries) will be interviewing data subjects from the Roma and Travellers populations who will be selected randomly (via random walk in randomly selected localities) in all countries but Ireland, where the respondents will be selected non-randomly by cooperating individuals and contact persons at municipal level so that the selected respondents fulfil prescribed quotas by age and sex. The sub-processors may also collect contact details of cooperating individuals and contact persons at municipal level to be able to get into contact with respondents or learn about the locality. These contact details will be obtained through desk research and further referrals by the cooperating individuals and contact persons.

Face to face interviews will be conducted using CAPI devices – tablets. Additionally to the data collected via the questionnaire, they will collect contact details from the respondents, such as name, address, telephone number if necessary and the CAPI device will also record the GPS of the interview venue. These will only be used for

keeping contact during the interview process and for quality check purposes and be accessible only via the “Quality Check” manager of the national polling agency (sub-processors), the local sub-contractors as defined in the contract. It will not be provided to the main contractor Ipsos NV or FRA. The sub-processors will comply with the data protection provisions foreseen in the contract signed between FRA and Ipsos. FRA will get reassurances of the safeguards to be followed to respect the privacy of respondents, also with respect to the data processed in the three accession countries.

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

*Whose personal data are being processed?*

- |               |                                     |
|---------------|-------------------------------------|
| FRA staff     | <input type="checkbox"/>            |
| Non-FRA staff | <input checked="" type="checkbox"/> |
- Respondents - persons who consider themselves to be Roma or Traveller aged 16 or older and who live in one of the survey countries: Albania, Bulgaria, Czechia, France, Hungary, Greece, Ireland, Italy, North Macedonia, Portugal, Romania, Serbia and Spain.
- Persons who are mediating contact between the interviewer and the respondent. These persons might be also Roma and Travellers themselves. Usually, they are members of the local civil society organization working with Roma and Travellers in the given country.

#### 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*

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

- |  |                                     |
|--|-------------------------------------|
| Personal details (name, surname, age, sex, address)                                |                                     |
| Contact details (postal address, mobile number)                                    | <input checked="" type="checkbox"/> |
| Education & Training details   | <input checked="" type="checkbox"/> |
| Employment details (work experience, languages, type of the employer/organisation) | <input checked="" type="checkbox"/> |
| Financial details (e.g. financial identification form, bank account information)   | <input type="checkbox"/>            |
| Family, lifestyle and social circumstances   | <input checked="" type="checkbox"/> |
| Goods or services provided   | <input type="checkbox"/>            |
| Other (please give details): GPS of the interview venue                            |                                     |

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

The personal data collected reveal:

Racial or ethnic origin	<input checked="" type="checkbox"/>
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"/>
<i>NOTE: the questions in the survey concerning health are limited to asking respondents' own assessment (opinion) of their health status and in case of female respondents on their experiences with giving birth, other genetic or biometric data are not collected</i>	
Information regarding an individual's sex life or sexual orientation	<input checked="" type="checkbox"/>
<b>(c) Personal data relating to criminal convictions and offences (Article 11)</b>	
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))<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

*Selected members of the Equality, Roma and Social Rights Unit and all assigned Roma survey (A3.1) project team members will have access to anonymized data resulting from the survey. Respondents' answers to the survey will be stored in a data set. Individual respondents cannot be identified from the data set.*

Designated persons **outside** FRA:

*Contractor's research staff (for the duration of the contract) – Ipsos NV and its sub-contractors for the implementation of Ipsos's contract with FRA.*

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

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

<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.

*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.*

**Transfer outside of the EU or EEA**

Yes

No

However, the personal data of respondents collected in the three accession countries (Albania, North Macedonia and Serbia) by the local polling agencies will be processed in third countries (while being hosted in the servers within the EU). In this case, in accordance with the personal data protection provisions included in the contract signed between FRA and Ipsos, adequate safeguards will be in place.

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

**Transfer to international organisation(s)**

Yes

No

If yes specify to which organisation:

**Legal basis for the data transfer**

Transfer on the basis of the European Commission's adequacy decision (Article 47) Commission implementing decision on the adequate protection of personal data by the United Kingdom.

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"?*

FRA is due to receive the final data set from the contractor by 23 December 2024. After receiving the final data set, the agency will double-check that the data set does not contain any personal data. Any personal data detected as a part of this process will be deleted by the end of contract with the contractor (17 March 2025). The anonymised dataset will be stored indefinitely.

**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

Outlook Folder(s)	<input checked="" type="checkbox"/>
CRM	<input type="checkbox"/>
Hardcopy file	<input type="checkbox"/>
Cloud (MS 365)	<input checked="" type="checkbox"/>
FRA's DMS is stored in the cloud. Only documentation of the project (without personal data of the data subjects) is stored.	
Servers of external provider	<input checked="" type="checkbox"/>
In all cases, data will be stored and transferred between the Ipsos NV central team, network partners and FRA securely – password-protected, zipped and transferred via our globally approved secure file transfer portal (Ipsos Transfer).	
All sample and data files containing personal details and/or identifiable information will be <b>securely deleted by the sub-processors using Blancco File Shredder software</b> after a pre-specified retention period expires. This software erases sensitive files securely and permanently from computers and servers.	

## 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 individual sub-processors' dedicated email

### **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