

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

NAME OF PROCESSING OPERATION²:

Workshop and final conference under the regional project “Supporting National Human Rights Institutions in monitoring fundamental rights and the fundamental rights aspects of the rule of law”, 20-22 February 2024, Brussels, Belgium

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Part 1 (Publicly available)

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| 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 Email: contact@fra.europa.eu Organisational unit responsible⁴ for the processing activity: Interinstitutional Cooperation and Networks Contact details: NHRBteam@fra.europa.eu Data Protection Officer (DPO): dpo@fra.europa.eu |

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| 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 a third party (contractor) <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?

For the organisation of the events, including travel and accommodation, as well as catering arrangements: [MCI Benelux SA](#), acting as FRA's processor.

Contact point at external third party: ec-events@wearemci.com

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 for the proper organization at the premises of the EFTA House, Brussels, Belgium, from 20 to 22 February of one workshop and the final conference (hereinafter: the events) in the framework of the regional project "Supporting National Human Rights Institutions in monitoring fundamental rights and the fundamental rights aspects of the rule of law", funded under the EEA and Norway Grants. For the purposes of organising these events, FRA, being the lead partner and organiser of the events, carries out the following processing activities: organising travel and accommodation arrangements (through the contractor MCI Benelux S.A.), mailing lists of contacts, correspondence with speakers, moderators, and participants, preparing of the programme and sessions, as well as event follow up actions such as event report.

FRA's data processor is **MCI Benelux S.A.**, which supports the registration and the logistics of the organisation of the events through a framework contract with the European Commission. Organisational measures may include sharing your data with authorised subprocessors, such as the companies responsible for travel, accommodation, and catering.

The purpose of the processing of personal data is handling registration and attendance, reporting on the events, 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, follow-up meetings, follow-up actions, giving access to premises, providing catering, assistance for accommodation and travel, photographs/pictures, presentations, audio and/or video recording of speakers and participants of the final conference, news and publications.

The workshop will take place only face-to-face. The final conference will also take place face to face except for one of the participants who will join the event via an online link to Teams set up by the FMO Secretariat at the EFTA House in Brussels.

For the organisation of the events, including the travel and accommodation as well as catering arrangements, FRA and its processor MCI Benelux collects from data subjects the personal data described in Section 5 below via email and via the registration form sent to the participants by email.

Should participants inform FRA about the sensitive personal data mentioned below, their consent to the processing will be requested by email.

The registration process and email campaigns will be managed via the software **Stova** (former **Aventri**). The system uses first party cookies and essential cookies only for functional purposes to improve users' website experience.

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 any user; however, the cookies will recognise the user's individual web browser or device through its IP address, the browser version, or the device's operating system.

Aventri will not use and/or process the data collected during the registration process other than to store it for the Contractor (MCI Benelux S.A). Event reminder emails and a post-event follow up emails will be sent also through Aventri. Please refer to [Stova's privacy policy](#) and [Aventri's cookie policy](#) for further information.

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).

Registration and database management are handled on Stova's EU servers, and all data is kept within the European Union. Therefore, no international data transfers occur.

For identifying participants and speakers for the events, the FRA has reached out by e-mail to different institutions/organisations, complemented by selected email addresses of FRA key stakeholders and networks who had in both cases consented to further communication and are part of FRA's Customer Relationship Management system (CRM), see data protection notice [here](#).

For the production of badges, the list of participants will be shared with FRA's contractor MCI Benelux.

Moreover, for identifying participants for the events, the FRA has also collected publicly available (internet) contact details such as email addresses, names, or surnames.

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

Whose personal data are being processed?

FRA staff

Non-FRA staff (project partner representatives from NHRIs, policy makers from the national and EU level, experts, European Commission representatives, CSO representatives etc.).

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, date of birth, gender, nationality, address. For organising travel and accommodation participants may be required to provide data of birth, nationality, ID or passport number to FRA or to FRA's processor. Collecting such data might be necessary in those cases to comply with the national and international laws applicable to travels and air carriers.

For participants for which FRA will cover and organise travel and accommodation, the contractor MCI Benelux will also collect the following data acting as FRA's processor on its behalf:

- Departure city, country,
- Preferred departure date,
- Return city, country,
- Preferred return date
- Specific travel request, if any as indicated by participant

Contact details: email address, mobile phone numbers (optional).

Education & Training details

Employment details (function/title, 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):

- Image audio and/or video recordings of data subjects participating in the final conference transmitted via Teams through the link provided to the participant joining the event online.

- IP addresses and/or cookies of participants and other metadata may also be collected by the online registration tool as indicated in Section 3 above.

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

The personal data collected may reveal:

Racial or ethnic origin

Political opinions

Religious or philosophical beliefs

Trade union membership

Genetic, biometric or data concerning health

Information regarding an individual's sex life or sexual orientation

N/A

- The image, photo, and audio and video recordings of all participants, speakers, and moderators taking part in the final conference (in person or online) might incidentally reveal racial or ethnic origin, political opinions, and religious belief.

- Food preferences indicated by the participants in the registration form for the organisation of the catering may reveal health conditions and/or religious beliefs.

- Limited information on health conditions (e.g. special accommodation required by participants with disabilities) that need to be taken into account for organising the travel and accommodation.

(c) Personal data relating to criminal convictions and offences (Article 11)

Criminal record (or similar, e.g. declaration of good conduct)

N/A

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
(Institutional Cooperation and Networks Unit)

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

Recipients **outside** FRA:

Restricted staff of FRA's processors and subprocessors, which are bound by specific contractual clauses for any processing operations of participants' personal data on behalf of FRA, and by the confidentiality obligations deriving from Regulation (EC) 2018/1725) might have access to some personal data as indicated in the respective data protection notices and Sections above.

In addition, for organizational purposes (e.g., access to the premises), the staff of the EFTA House might also have access to some of participants' personal data, such as name and organization.

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)

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))

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.

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 events will be kept for one year after the end of the implementation period of the project, which is 29 February 2024.

Information concerning the events on the FRA corporate website will be retained for five years.

MCI Benelux S.A. will keep the participants list for no longer than the date of 31 December 2024. After that date, the data will be purged.

Sensitive 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 meetings but no later than within 1 month after the end of the meetings.

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) | <input checked="" type="checkbox"/> |
| 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 NHRBteam@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