

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

NAME OF PROCESSING OPERATION²:

Human Rights Communicators Network Meeting – 28-29 June 2021

Reference number: DPR-2021-133 (to be completed by the DPO)
Creation date of this record: 11 June 2021
Last update of this record: 16 June 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 Email: contact@fra.europa.eu Organisational unit responsible⁴ for the processing activity: <i>Communications and Events Unit.</i> Contact details: event@fra.europa.eu Data Protection Officer (DPO): dpo@fra.europa.eu

2) Who is actually conducting the processing? (Article 31.1(a))⁵
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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?

The data is processed by the FRA itself

The data is processed also by a third party (contractor)

FRA contractor (processor): **Tipik**

Avenue de Terveuren 270, B-1150 Brussels, Belgium

info@tipik.eu

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).

Data will be collected for the purpose of organizing the virtual meeting Human Rights Communicators Network Meeting – 28-29 June 2021, as well as to inform participants of any follow-up activities after the event.

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

Whose personal data are being processed?

FRA staff

Non-FRA staff
(Participants to the meeting)

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 (e.g. name, surname, job position, organisation) | <input checked="" type="checkbox"/> |
| Contact details (e.g. email address) | <input checked="" type="checkbox"/> |
| Education & Training details | <input type="checkbox"/> |
| Employment details (e.g. name and 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 type="checkbox"/> |
| Goods or services provided | <input type="checkbox"/> |
| Other (please give details): | <input checked="" type="checkbox"/> |

Minutes will be collected and one video of the event will be produced. This 4 minute video of the event will be produced by FRA contractor and shared with participants only.

The opening session on 28 June 2021 will be live streamed to the public. The live stream will also be recorded and will be made available to meeting participants, members of the Human Rights Communicators' Network who were not able to attend the meeting and everyone visiting FRA website after the event.

(b) Sensitive personal data (Article 10)

The personal data collected reveal:

- | | |
|--|-------------------------------------|
| Racial or ethnic origin (videos recording the event could reveal the racial or ethnic origin of the recorded participants) | <input checked="" type="checkbox"/> |
| Political opinions | <input type="checkbox"/> |
| Religious or philosophical beliefs | <input type="checkbox"/> |
| Trade union membership | <input type="checkbox"/> |
| Genetic, biometric or data concerning health | <input 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)

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

Staff members of FRA Communications and Events Unit and Institutional Cooperation and Networks Unit

Recipients **outside** FRA:

Staff of FRA's contractor Tipik info@tipik.eu.

Selected staff of Tipik have access to the data through the development of the event website and registration platform, as well as selected staff of the following sub-processors:

- Technical provider **Jumpcut**, will receive access to speakers' information in order to setup technical rehearsal calls and to help speakers connect to the livestream.
- **Umbraco CMS**, was used to create a frontend-based registration form system.
- **Sli.do** tool offers a service that enables real-time active engagement of participants at an event. Although there are no registration required, participants have the choice during Q&As and Polls to include their name, company name, location etc. This data can be exported after the event to keep track of the questions asked, polling results etc.
- **Webex** will be the online platform used for the event, it will collect the names and emails of the speakers and participants connecting to the calls.
- **Matomo**: Cookies (from Matomo) will enable FRA to track the following information about visitors. We use this information to prepare aggregated, anonymous statistics reports of visitors' activity

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*

* We are aware that Webex-Cisco is a U.S.-based company and thus after the Schrems II ruling we need to have additional safeguards in place even when data is stored only in EU-based servers. These measures are needed to address the risk of a transfer of data from Webex-Cisco to U.S. authorities under a federal law order (as foreseen by U.S. federal law). To address this very rare possibility, we made sure that Webex-Cisco enables end-to-end encryption: this kind of encryption ensures that personal data in clear cannot be accessed neither by Webex-Cisco itself.

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.

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.

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"?

Data will be retained for 2 years, from the last day of the meeting.

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 type="checkbox"/>
Hardcopy file	<input type="checkbox"/>
Cloud (give details, e.g. cloud provider M365)	<input checked="" type="checkbox"/>
Servers of external provider	<input checked="" type="checkbox"/>
Other (please specify): TIPIK, as FRA contractor for event organisation	

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)