

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

NAME OF PROCESSING OPERATION²: Survey on women's life and wellbeing.

Reference number: DPR-2023-182 (to be completed by the DPO)
Creation date of this record: 18/04/2023
Last update of this record: 18/04/2023
Version:1.0

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 Email: contact@fra.europa.eu Organisational unit responsible⁴ for the processing activity: Justice, Digital and Migration Unit Contact details: statisticssurveys@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 a third party: <input checked="" type="checkbox"/></p> <ul style="list-style-type: none"> • Joint controller: European Institute for Gender Equality

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?

Contact (DPO): (DPO@eige.europa.eu)

- Processor: Ipsos NV (contractor)

Contact (DPO): (DPO.Belgium@ipsos.com)

The processor (FRA's contractor) was selected following an EU public procurement procedure.

- Sub-processor (subcontractor) – Cyprus: CYMAR Market Research Ltd

Contact (DPO): (dpo.cymar@gmail.com)

- Sub-processor (subcontractor) – Czechia: MindBridge Consulting

Contact (DPO): (kravka@mindbridge.cz)

- Sub-processor (subcontractor) – Luxembourg: TNS

Contact (DPO): (jean-francois.pierret@ilres.com)

- Sub-processor (subcontractor) – Germany: Ipsos Germany

Contact (DPO): (Sandro.matzke@ipsos.com)

- Sub-processor (subcontractor) – Hungary: Ipsos Hungary

Contact (DPO): (dpo.hungary@ipsos.com)

- Sub-processor (subcontractor) – Ireland: Ipsos Ireland

Contact (DPO): (dpo.ireland@ipsos.com)

- Sub-processor (subcontractor) – Romania: Ipsos Romania

Contact (DPO): (alina.serbanica@ipsos.com)

- Sub-processor (subcontractor) – Sweden: Ipsos Sweden

Contact (DPO): (Christian.jacobsson@ipsos.com)

- Sub-processor: RackSpace Germany which hosts the Dimensions online tool

- Sub-processor: Novatel EOOD Bulgaria, which hosts the survey fieldwork tool iField

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 survey on women's life and well-being implements the project B.1.7 'Violence against women II: filling the data gap' included in FRA's Single Programming Document 2023-2025. EIGE, as the co-controller of the data, has also included the project in their Single Programming Document 2023-2025 ('under thematic priority 'gender-based violence').

The purpose of the survey is to collect comparable data on women's experiences of violence – including intimate partner violence as well as violence perpetrated by other people. The survey is largely based on the Eurostat-coordinated European survey on gender-based violence against women and other forms of inter-personal violence (EU-GBV) and the [methodology proposed by Eurostat](#). The survey supports the efforts of the EU and its Member States to eradicate violence against women and support the victims. In a majority of EU Member States the national statistical authorities are implementing the EU-GBV survey – however, 8 Member States are not doing so nor do they have other sources that would provide comparable data. Therefore, FRA and EIGE are implementing the survey in these eight countries – namely, Cyprus, Czechia, Germany, Hungary, Ireland, Luxembourg, Romania and Sweden.

The survey will process personal data for the purpose of organising the survey data collection – in three phases: the usability test, the pilot and the mainstage survey. In each of the three phases, the personal data that will be processed will include names, addresses, telephone numbers and email addresses that will be used to contact the people selected into the sample, schedule the interviews and, after the interviews, to administer the survey incentives and perform any necessary quality control checks. The survey interviews will collect information on women's experiences, opinions and socio-demographic characteristics – however, these data will be stored separately from the personal data. The personal data will be kept only as long as it is necessary to carry out the data collection and quality control activities, and they will be destroyed at the end of the contract. Other survey data which doesn't contain any personal details will be stored indefinitely for research purposes.

The way respondents' personal data will be collected and used – for the purpose of organising the interviews – depends on the data sources that are available in each country. With respect to data availability, the survey countries fall in three groups:

1. Selection from a population register (Hungary, Luxembourg, Sweden). The fieldwork agencies in Hungary and Sweden to request from the population register a random sample of respondents. This includes people's names and addresses, which are necessary for the interviewers to contact the respondents in person (in Hungary) or to mail the persons letters inviting them to complete the survey online (in Sweden). In Luxembourg, based on previous FRA surveys, the population register does not share people's contact details, but the register draws the sample and mails the survey invitation letters (prepared by FRA, EIGE and Ipsos) to the selecting persons. The letters contain an individual link which allows Ipsos to monitor which letters have led to a completed survey as well as the cases where additional reminders should be sent. The population register in Luxembourg will then send the letters to the persons who have not already completed the survey, without sharing their personal data with FRA, EIGE or Ipsos.

2. Address registry-based sampling (Czechia, Ireland). In these two countries, the survey does not have access to registers of individuals, but building registers are used instead. This involves drawing a sample of buildings, and sending interviewers to the selected addresses to determine how many households reside at the address. Randomly selected households are contacted to introduce the survey and to establish whether any eligible people (women aged 18-74 years) are currently living the household. Interviewers then collect the names of eligible women and perform a random selection to choose one respondent. In case the selected respondent is not at home or the interview needs to be postponed for another reason, interviewers keep the name of the selected participants

until the interview has been conducted, the respondent refuses to take part in the survey, or the fieldwork period comes to an end.

3. Enumeration (Cyprus, Germany, Romania). In countries where the survey sampling cannot be based on register data, the contractor will first draw a sample of areas, after which enumerators are sent to a random starting point in these areas. The enumerators will then compile a list of addresses of private dwellings, and a sample of addresses is selected from these lists. After this, the procedure is similar as for address registry-based sampling, so that interviewers visit the selected addresses to establish the number of eligible persons and to select one that would be interviewed.

After completing the survey, respondents will be offered a small incentive as a 'thank you' for taking the time to answer the survey questions. In order to receive the incentive, they will be asked to provide their contact information. Respondents can also refuse the incentive in which case their contact information will not be collected.

The survey documents – including the data protection notice that will be provided to the respondents – will refer to the survey as a survey on women's life and well-being as a measure that aims to ensure respondent's safety. For example, in situations where women experience violence by their intimate partner who might react negatively upon overhearing that the woman would be interviewed concerning their experiences of violence (i.e. that she would be participating in a survey on violence against women).

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

Whose personal data are being processed?

FRA staff

Non-FRA staff (please specify e.g. Roma community, judges, etc.)

Data subjects are people contacted by the contractor to participate in the survey, as a part of the usability testing, piloting or the main stage of the survey. Participation in the survey is voluntary and participants are asked to consent to taking part. Personal data will only be used for the purposes of contacting respondents, while the data that will be retained after the data collection activities will be anonymous.

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, gender, address to contact respondents for the survey; closed-ended survey question on nationality

Contact details - postal address, telephone number, email address to contact respondents for the survey and to send the incentives after interview

Education & Training details: closed-ended survey questions on highest completed level of education

Employment details: closed-ended survey questions on employment status, occupation

Financial details

Family, lifestyle and social circumstances: closed-ended survey questions on household size and composition, and respondent's current partner and any previous partners

Goods or services provided

Other (please give details):

- Technically necessary cookies: The online survey will not use any cookies that would require the permission of the respondent
- IP addresses: for the quality control and validation of the data
- Metadata and Paradata: for the management and assessment of the data collection, the survey will also collect anonymous metadata and paradata such as information concerning the type of device (PC, smartphone, tablet, etc.) used to complete the online survey.

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

The personal data collected reveal:

Racial or ethnic origin: closed-ended survey questions on self-identified ethnic background category

Political opinions

Religious or philosophical beliefs: closed-ended survey question on religion or beliefs

Trade union membership

Genetic, biometric or data concerning health: closed-ended survey questions on overall health status, activity limitations, injuries and psychological health consequences of violent incidents, and use of health care services

Information regarding an individual's sex life or sexual orientation: closed-ended survey questions on experiences of sexual violence, on sexual orientation and gender identity

N/A

(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** and **EIGE** staff members:

Survey data collection activities will be managed by the survey contractor, Ipsos NV. During the data collection process, it is not foreseen for FRA or EIGE to receive personal data, and after the end of the data collection the contractor transmits to FRA or EIGE the anonymous survey data. However, FRA and EIGE, as joint controllers could request access to the personal data which the contractor is processing on their behalf. After the end of data collection and quality control activities, the contractor will destroy all personal data and only anonymous survey data will remain.

Recipients **outside** FRA: Ipsos NV
(please provide a generic/functional mailbox)

The processor (survey contractor, Ipsos NV) and the subprocessors (Ipsos' local agencies and other subcontractors of Ipsos NV) will process the personal data that is necessary to organise the data collection activities, such as names, addresses and – in selected countries – email addresses needed for delivering the survey incentives after the interview (respondents can also decline the incentive in which case no email addresses will be recorded).

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.

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 outside of the EU or EEA

Yes

No

Personal data will not be transferred outside the EU or EEA. Anonymous survey data will be shared with researchers, including those outside the EU and EEA. Data collected through the Dimensions interviewing platform will be hosted in the data centre of RackSpace in Germany. Some members of the Ipsos NV team are based in their London office, and their processing of the data takes place under the EU-UK adequacy decision.

If yes, specify to which country: United Kingdom.

Transfer to international organisation(s)

Yes

No

Personal data will not be transferred outside the EU or EEA. Anonymous survey data will be shared with researchers, including those working for international organisations.

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))

- 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"?

Personal data (names, addresses, telephone numbers, email addresses) will be destroyed after the end of the data collection activities and quality control measures, at the latest by the end of the contract. Anonymous survey data will be retained indefinitely for research purposes.

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 type="checkbox"/>
CRM	<input type="checkbox"/>
Hardcopy file	<input type="checkbox"/>
Cloud (FRA's cloud service provider for DMS)	<input checked="" type="checkbox"/>
Servers of external provider	<input checked="" type="checkbox"/>
Other (please specify):	

Personal data necessary for implementing the survey data collection (names, addresses) will be handled by the survey contractor and it is not foreseen that these data are transmitted to FRA, and FRA will only receive anonymous survey data. However, should it become necessary for FRA as the data controller to request the contractor (data processor) to transmit any personal data to FRA, these data would be stored on FRA's network shared drive Q, with access limited to only nominated project team members. Anonymous survey data will also be stored on the shared network drive (Q drive).

The data collected using Ipsos' Dimensions platform is hosted in the data centre of RackSpace in Germany. Data collected through Ipsos' iField platform is hosted on Novatel EOOD provided by Equinix in Bulgaria.

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?

People exercise their rights by sending an e-mail to statisticssurveys@fra.europa.eu. See further details in the Data Protection notice. Data subjects can exercise the rights listed below up until their personal data have been destroyed. After this, only anonymous survey data remains and it will not be possible to identify data subjects from the survey data set.

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