

Video questions submitted by members of the Human Rights Communicators Network

The European Union Agency for Fundamental Rights (FRA or Agency) processes the personal data of a natural person in compliance with Regulation 2018/1725 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/EC.

This privacy notice explains FRA's policies and practices regarding its collection and use of your personal data, and sets forth your privacy rights. We recognise that information privacy is an ongoing responsibility, and we will update this notice where necessary.

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1. Why do we collect personal data? We collect personal video recordings sent by communicators to the FRA, for the purpose of asking questions to panelists and presenters of the Annual Meeting of the Human Rights Communicators Network, to be celebrated on the 28 and 29 June online. The recordings are therefore the events and videos produced in the context of the Human Rights Communicators Network.

2. What kind of personal data does the Agency collect?

We will collect only the following personal data necessary for the processing operation described above.

(a) General personal data:

- Personal details: name, surname
- Contact details: email address
- Professional detail: name of position and name of organization

(b) Special categories of personal data:

- video revealing racial/ethnic origin

3. How do we collect your personal data?

Information you provide us via a video recording of yourself on challenges confronted when communicating on human rights topics.

4. Who is responsible for processing your personal data?

The Agency is the legal entity responsible for the processing of your personal data and determines the objective of this processing activity. The Head of Communications and Events Unit is responsible for this processing operation.

5. Which is the legal basis for this processing operation?

Communication activities (including organisation of events) are necessary for the functioning of FRA as provided for in Regulation (EC) No. 168/2007 establishing the European Union Agency for Fundamental Rights, in particular, in Article 4(1)(h). Therefore, the processing is lawful under Article 5.1 (a) of the Regulation (EU) No 2018/1725.

The processing of special categories of data (video revealing racial/ethnic origin) is lawful under Article 10(2)(a). Specific consent has been given and it is stored.

6. Who can see your data? The access to your personal data is restricted to authorized staff of the Communication and Events Unit and selected staff from the contractor Tipik dedicated to the organization of the event for FRA.

7. Do we share your data with other organisations?

Personal data is processed by the Agency only. In case that we need to share your data with third parties, you will be notified to whom your personal data has been shared with.

8. Do we intend to transfer your personal data to Third Countries/International Organizations

No.

*The meeting where the videos will be displayed will be hosted via Webex-Cisco. We are aware that this 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.

9. When we will start the processing operation?

We will start the processing operation at the time of reception of the video interview.

10. How long do we keep your data?

The video will be retained for a maximum of 6 months after having been received. Since the video question will be used for a “live panel debate” or for a workshop, as per given consent of the data subject, a few seconds might appear as part of a 3 min video summary clip of the event.

11. How can you control your data?

Under Regulation 2018/1725, you have rights we need to make you aware of. The rights available to you depend on our reason for processing your information. You are not required to pay any charges for exercising your rights except in cases where the requests are manifestly unfounded or excessive, in particular because of their repetitive character.

We will reply to your request without undue delay and in any event within one month of receipt of the request. That period may be extended by two further months where necessary, taking into account the complexity and number of the requests.

You can exercise your rights described below by sending an email request to event@fra.europa.eu

11.1. How valuable is your consent for us?

Since your participation is not mandatory, we need proof that you consented to the processing of your personal data. Consent will be collected via email. You have the right to withdraw your consent at any time, and we will delete your data or restrict its processing. All processing operations up until the withdrawal of consent will still be lawful.

11.2. Your data protection rights

a. Can you access your data?

You have the right to receive information on whether we process your personal data or not, the purposes of the processing, the categories of personal data concerned, any recipients to whom the personal data have been disclosed and their storage period. Furthermore, you can have access to such data, as well as obtain copies of your data undergoing processing.

b. Can you modify your data?

You have the right to ask us to rectify your data you think is inaccurate or incomplete at any time.

c. Can you restrict us from processing your data?

You have the right to restrict the processing of your personal data. If you do, we can no longer process them, but we can still store them. In some exceptional cases, we will still be able to use them (e.g. with your consent or for legal claims). You have this right in a few different situations: when you contest the accuracy of your personal data, when the Agency no longer needs the data for completing its tasks, when the processing activity is unlawful, and finally, when you have exercised your right to object. Can you delete your data?

You have the right to ask us to delete your data when the personal data are no longer necessary for the purposes for which they were collected, when you have withdrawn your consent or when the processing activity is unlawful. In certain occasions we will have to erase your data in order to comply with a legal obligation to which we are subject.

We will notify to each recipient to whom your personal data have been disclosed of any rectification or erasure of personal data or restriction of processing carried out in accordance with the above rights unless this proves impossible or involves disproportionate effort from our side.

d. Are you entitled to data portability?

Data portability is a right guaranteed under Regulation 1725/2018 and consists in the right to have your personal data transmitted to you or directly to another controller of your choice.

In this case, this does not apply for two reasons: I) in order for this right to be guaranteed, the processing should be based on automated means, however we do not base our processing on any automated means; II) this processing operation is carried out in the public interest, which is an exception to the right to data portability in the Regulation.

e. Do you have the right to object?

When the legal base of the processing is “necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Union institution or body” which is the case in most of our processing operations, you have the right to object to the processing. In case you object, we have to stop the processing of your personal data, unless we demonstrate a compelling reason that can override your objection.

f. Do we do automated decision making, including profiling?

No.

12. What security measures are taken to safeguard your personal data?

The Agency has several security controls in place to protect your personal data from unauthorised access, use or disclosure. We keep your data stored on our internal servers with limited access to a specified audience only.

13. What can you do in the event of a problem?

a) The first step is to notify the Agency by sending an email to event@fra.europa.eu and ask us to take action.

b) The second step, if you obtain no reply from us or if you are not satisfied with it, contact our Data Protection Officer (DPO) at dpo@fra.europa.eu.

c) At any time you can lodge a complaint with the EDPS at <http://www.edps.europa.eu>, who will examine your request and adopt the necessary measures.

14. How do we update our privacy notice?

We keep our privacy notice under regular review to make sure it is up to date and accurate.

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