

**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>: Reinforcing the EU Charter: rights of people in the EU in the next decade – online event**

Reference number: DPR-2020-115
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Part 1 (Publicly available)

<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 Telephone: +43 1 580 30 – 0 Email: <a href="mailto:contact@fra.europa.eu">contact@fra.europa.eu</a> Organisational unit <b>responsible<sup>4</sup></b> for the processing activity: Institutional Cooperation and Networks Unit (INST) Contact details: Andreas Accardo, Head of INST, <a href="mailto:charter@fra.europa.eu">charter@fra.europa.eu</a> Data Protection Officer (DPO): Robert Jan Uhl <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 checked="" type="checkbox"/></p> <p>The data is processed also by a third party (processor) MCI Brussels. <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?

Contact point at external third party: *Isabelle Deniaud, MCI Benelux SA, Boulevard du Souverain 280, 1160 Brussels, Belgium, [isabelle.deniaud@mci-group.com](mailto:isabelle.deniaud@mci-group.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).*

*FRA is organizing an event, "Reinforcing the EU Charter: rights of people in the EU in the next decade" ("the event"). FRA is responsible for the overall organisation of the event, the communication with the speakers and participants before and after the end of the event, as well as communication and promotion of the event.*

*The purpose of the processing of your personal data is handling registration and attendance, identify and invite plenary speakers and discussants, reporting on the event, 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, photographs/pictures, presentations, audio and/or video recording of speakers and participants, news and publications.*

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

*Whose personal data are being processed?*

- |   |                                     |
|---|-------------------------------------|
| FRA staff   | <input checked="" type="checkbox"/> |
| Non-FRA staff. (participants to the online event) | <input checked="" type="checkbox"/> |

**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)

Contact details (e.g. email address)

Education & Training details

Employment details (e.g. work experience, 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):

**(b) Sensitive personal data (Article 10)**

The personal data collected 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

**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 of INST unit, staff of other units as needed).

Recipients **outside** FRA:  
(MCI Brussels - [isabelle.deniaud@mci-group.com](mailto:isabelle.deniaud@mci-group.com))

**7) Transfers to third countries or international organisations (Article 31.1 (e))<sup>6</sup>**

*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

<sup>6</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.

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))***

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 will be kept after the Event to ensure implementing necessary follow-up activities with regard to the purpose(s) of the processing of personal data as well as for its related management. Data necessary for logistics purposes (reimbursement of expenses, transport, etc.) are kept according to the rules set in the Regulation (EU, Euratom) 2018/1046. Personal data related to registration and participation will be retained by FRA for a maximum of one year after the end of the event, that is 7 December 2021.*

*Photos, audio and video recordings are stored on the FRA Communication and Events Unit drive for three years. Within this time, the files to be used for communication purposes and/or be archived for historical purposes shall be selected. The remaining files shall be deleted.*

*Information concerning the event on the FRA corporate website will be retained for 10 years.*

#### 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 type="checkbox"/>            |
| Outlook Folder(s)                | <input type="checkbox"/>            |

CRM	<input checked="" type="checkbox"/>
Hardcopy file	<input type="checkbox"/>
Cloud (give details, e.g. cloud provider)	<input type="checkbox"/>
Servers of external provider	<input checked="" type="checkbox"/>
Other (please specify):	

## 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 [charter@fra.europa.eu](mailto:charter@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)

### 11) Lawfulness of the processing (Article 5(a)–(e))<sup>7</sup>: Processing necessary for:

<sup>7</sup> Tick (at least) one and explain why the processing is necessary for it. Examples:

(a) a task attributed to your EUI by legislation, e.g. procedures under the staff regulations or tasks assigned by an Agency’s founding regulation. Please mention the specific legal basis (e.g. “Staff Regulations Article X, as implemented by EUI IR Article Y”, instead of just “Staff Regulations”)

(a2) not all processing operations required for the functioning of the EUIs are explicitly mandated by legislation;