

## **Event ‘Putting human rights at the heart of Europe’s future’, Human Rights Leaders and Experts Meeting on 7-8/09/2022 in Rust, Austria.**

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

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## 1. Why do we process personal data?

The purpose of the processing of your personal data is handling registration and attendance to the FRA – Human Rights Leaders & Experts meeting (hereinafter: the event), organizing travel and accommodation arrangements, reporting on the event, granting you access to the venue, as well as event follow up actions, such as sharing presentations and personal descriptions among participants and feedback collection. It includes in particular mailing lists for contacts, invitations of participants, reports, minutes, distribution of reports/minutes, meeting follow-up, photographs, video recording with full respect of the Chatam House Rule and audio recording of moderators and participants for note-taking purposes, based on their explicit consent. Participants may also choose to share a short bio (e.g. name, organisation, email address) with other participants of this meeting.

## 2. What kind of personal data does the Agency process?

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

### (a) General personal data:

- Personal details: name, surname, country, short description/bio video recordings and photographs
- Contact details: email address, mobile phone number
- Employment details: name and type of the employer/organization, function/title,
- Other:
  - Audio recording of the participants and moderator (only for note-taking purposes)
  - Cookies: The collection of registration data and email campaigns will be managed via the software Aventri. The system uses essential cookies and cookies to improve your website experience and to generate anonymous, aggregate user statistics. Aventri only stores the data for the Contractor (MCI Benelux S.A) who is the event organiser of this event. Event reminder emails and a post-event follow up email will be sent through Aventri. For further information on cookies and the management thereof, please refer to Aventri's [cookie policy](#).
  - IP address (please refer to Aventri's [Privacy Policy](#))

### (b) Special categories of personal data:

- Data concerning health (data concerning health might be revealed by information on dietary requests or allergies and special needs/accessibility requirements, if any)
- Photographs and video recordings might reveal racial or ethnic origin, political opinions and religious or philosophical beliefs.

### **3. How do we collect your personal data?**

- 3.a. Information you provide us: for the registration and during the participation in the event (see Section 2 of this document)

FRA has collected publicly available email addresses and email addresses from participants of the Fundamental Rights Forum 2021 who had consented to further communication.

More concretely, the collection of the necessary data during the registration will be managed by MCI Benelux S.A. through a registration form provided via the software Aventri (please see [Aventri's Privacy Policy](#)).

### **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 the Communications and Events Unit is responsible for this processing operation.

MCI Benelux S.A. (MCI) [Boulevard de Souverain 280, 1160 Brussels, Belgium, +32 2 320 25 03, [EU-FRA-events@mci-group.com](mailto:EU-FRA-events@mci-group.com)] is the processor for this event. A contract between FRA and MCI has been signed for this purpose

For the implementation of the contract, MCI uses the following sub-processors:

- For registration purposes: Aventri please also refer to Aventri's [Privacy Policy](#)
- For Travel: The full name of the participant will be shared with the travel agency, [Eagle Travel](#)
- Meeting venue and accommodation is organised at the [Seehotel Rust](#) which will act as separate controller.

Touché Videoproduktion OG, [Thaliastraße 2/17 ,1160 Vienna, Austria , +43 1 23 99 145 , [office@touchevideoproduktion.com](mailto:office@touchevideoproduktion.com)] is the processor of the photographs and video recordings. A contract between FRA and Touché Videoproduktion OG has been signed for this purpose.

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

The processing operation is in line with the Agency's objectives, as stated in Article 2 of its founding Regulation (EC) No 168/2007, as amended by Regulation (EU) 2022/555 (the amended Founding Regulation), to provide its stakeholders, including Union institutions and EU Member States, with assistance and expertise relating to fundamental rights, particularly including its tasks described in Article 4 (1)(h). Therefore, the processing operation is lawful under Article 5.1.(a) of the EU Data Protection Regulation (EU) 2018/1725

In addition, the processing of the personal data is also in accordance with Article 5.1.(d) of Regulation (EU) No 2018/1725, as regards the participants' provision of their personal data through the registration form, their participation in the event along with the activities thereof, as well as the audio recording of moderators and participants, and the possible sharing of their short bio with other participants in the meeting, based on the scope of their consent.

The processing of special categories of personal data is lawful under Article 10.2.(a) of Regulation (EU) 2018/1725. Specific consent has been given and it is stored.

#### **6. Who can see your data?**

Access to your data is granted to authorised staff of FRA (restricted number of staff members in charge of the organisation of the meetings) and its contractor (MCI) (designated staff-project team members) bound by confidentiality clauses. Access to your data will also be granted to the service provider involved in the organisation of the event this includes Aventri, travel agency and hotel as well as Touché Videoproduktion OG provider of photographic services and video recordings, see Section 4 above.

#### **7. Do we share your data with other organisations?**

Personal data is processed by the Agency (including the processor and its sub-processors) 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 personal data of the participants to the event will not be transferred to Third Countries or International Organisations.

Aventri is a non-EU-based service provider, but it will store your personal data on EU-based servers. Standard Contractual Clauses are in place with these service providers. Additional safeguards (end-to-end encryption) are also in place.

#### **9. When we will start the processing operation?**

We will start the processing operation in July 2022.

#### **10. How long do we keep your data?**

Personal data will be kept after the event to ensure implementing necessarily follow up activities with regard to the purpose(s) of the processing of personal data as well as for its related management. Personal data related to registration and participation will be retained by FRA for a period of 2 years after the event.

Photographs, video and audio recordings are stored in a FRA Communication and Events Unit drive for 12 months for further communication purposes and for activities related to the upcoming Fundamental Rights Forum. Information concerning the event 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 2022. After that date, the registration data will be purged from Aventri. The dietary requests and the specific access requirements (if any) will be kept for no longer than 2 weeks after 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](mailto:Event@fra.europa.eu)

### **11.1. The value of your consent**

Since your participation is not mandatory, we need proof that you consented to the processing of your personal data. Consent will be collected via the registration platform Aventri and during registration upon your arrival at the event. 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.

**d. 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.

**e. Are you entitled to data portability?**

Data portability is a right guaranteed under Regulation 1725/2018 and 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.

**f. 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.

**g. Do we do automated decision making, including profiling?**

Your personal data will not be used for an automated decision-making including profiling.

**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 unauthorized 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](mailto: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](mailto: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 data protection notice?**

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

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