

## Recording of meetings, training and info sessions

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 and process personal data?

We collect and process your personal data to produce a video and/or audio recording of FRA staff meetings, information sessions and trainings provided to FRA staff. Such meetings may take place online, in a hybrid format or in-person. The purpose of the recordings is to enable staff who were not able to participate in the meeting or training session to follow the session at a later stage, and to generate cost and time efficiency savings for the agency by reducing the need to repeat sessions as well as to retain knowledge.

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

We will collect only the following personal data from the meeting participants (including FRA staff members and non-FRA staff members such as training providers or consultants, where relevant) necessary for the processing operation:

### (a) General personal data

- Name and surname
- Title and Unit, depending on the online tool used
- Images of (certain) participants during the meeting (where consent is given to be filmed in case of face-to-face meetings or when the participant chooses to switch on the camera during online/hybrid meetings), and audio recording of participants who speak during the meeting. Images of participants who are present in the physical meeting/conference room might also be recorded.
- Information that participants chooses to share in the written chat function during the meeting

Depending on the online meeting tool used to hold the meeting, the following personal data might also be processed:

- IP address
- Cookies
- Connection data
- Email address

Please refer to the data protection notices of the respective online tools in section 3 below.

### (b) Special categories of personal data

- Racial or ethnic origin of participants might be revealed by the image and video recording of the meeting or training session

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

We collect your personal data through fixed or mobile recording tools in meeting rooms/the video and/or audio recording tools available in the online platforms used by the Agency to hold online/hybrid meetings namely, Microsoft Teams – MS 365 (see [data protection notice](#)) and Webex (see [data protection notice](#)).

Should different online video/conferencing tools be used for a meeting or training session, you will be informed and provided with the respective data protection notice before the meeting.

#### **4. Who is responsible for the 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 Corporate Services Unit is responsible for this processing operation.

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

Regular staff training and information sessions are necessary for the management and functioning of the Agency. In particular, the legal basis for this processing operation can be found in Articles 24a and 45 of the Staff Regulations, applicable by analogy to temporary and contract staff by virtue of Articles 11, 16 and 91 of the CEOS. Therefore, the processing is lawful under Article 5.1.(a) of the Regulation (EU) No 2018/1725. .

In addition, the processing of the personal data is also based on consent and in accordance with Article 5.1.(d) of Regulation (EU) No 2018/1725. Participants will be informed in advance that the meeting will be recorded and will have the option to appear without camera (if connected virtually), in an area of the room that is not recorded (if in person). If you choose to sit at the area which will be recorded or to switch on your camera, you consent to the processing of your personal data for the purposes described in section 1 above.

The processing of special categories of personal data is lawful under Article 10.(2).(a) of the same Regulation as the data subjects give consent for the recording.

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

The video and/or audio recording of the meeting or training session will be made available to FRA staff (including SNEs and trainees) via the FRA Intranet.

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

Personal data is processed by the Agency (including the processor and its sub-processors, if any) 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

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

We will start the processing operation at the start of the meeting or the training session.

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

Data will be kept for 1 year after the meeting, unless there is a clearly demonstrated recurrent need for the training session (e.g. general training on how to use a particular IT tool), in which case it may be kept for up to 3 years to reduce the need to repeat common training sessions.

## 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 access, modify or delete your personal data by sending an email request to [HR@fra.europa.eu](mailto:HR@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. Participants will be informed in advance that the meeting will be recorded and will have the option to appear without camera (if connected virtually), in an area of the room that is not recorded (if in person). If you choose to sit at the area which will be recorded or to switch on your camera, you consent to the processing of your personal data for the purposes described in section 1 above. 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 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.

**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 unauthorised access, use or disclosure. We keep your data stored on computer systems 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 [HR@fra.europa.eu](mailto:HR@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 privacy notice?

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

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