

[Survey on violence and related human rights abuses against women fleeing the war in Ukraine](#)

The European Union Agency for Fundamental Rights (FRA) 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 recognise 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?

FRA is conducting the interviews on violence and related human rights abuses against women fleeing the war in Ukraine to inform the policies of the EU and its Member States, so that their activities are based on representative and reliable evidence. The project involves survey interviews (including questions asked by an interviewer as well as a part of the questionnaire that respondents can answer on their own) and qualitative interviews with women from Ukraine aged 18-74. While answers to the survey interview questions and the qualitative interviews will be collected and analysed anonymously, information such as names and addresses are needed in order to invite people to participate in the interviews. The data collection will take place as face-to-face interviews in Czechia, Germany and Poland.

The project is included in FRA's work programme, as adopted by the agency's management board.

FRA has contracted the company Ipsos NV to carry out the survey and the qualitative interviews, following a public procurement procedure.

2. What kind of personal data does FRA process?

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

(a) General personal data:

- Personal details: name, surname, gender, address, nationality
- Contact details: postal address, email address, telephone number
- Education & Training details: highest completed level of education
- Employment details: employment status, occupation
- Family, lifestyle and social circumstances: questions on household size and composition, as well as one's current partner and any previous partners.
- Others:
 - For the management and assessment of the data collection, the survey will collect anonymous metadata and paradata such as interview time and length.

(b) Special categories of personal data:

The interviews contain voluntary questions on details such as racial or ethnic origin, religious beliefs, health data, sexual orientation and gender identity. These data will not be processed together with

general personal data that are necessary to organise the interviews. While participation in the interviews is voluntary, it is also possible to specifically skip these particular question.

3. How do we collect and process your personal data?

3a. Information you provide us:

This includes the answers you provide to the questions in the survey or in the qualitative interviews. The results of the research will be anonymised and you will NOT be identifiable, directly or indirectly, in any published results.

All interviews will take place in-person. In the survey, the interview will include interviewer-administered and self-administered sections. Self-administration involves you entering your answers to a tablet or a laptop provided by the interviewer, which provides an additional level of privacy since the interviewer will not have knowledge of your answers to the self-administered questions. The pilot interviews and in-depth interviews will be voice recorded, upon your consent.

Before the beginning of the survey, you will be asked to confirm that you are willing to start the interview. Should you participate in one of the pilot and/or in-depth interviews, you will also be asked if you agree to the audio recording of the interview and to sign a consent form.

You are free to choose which questions you answer, and which you do not. Since your participation in the interview is voluntary, you may also stop the interview at any time.

A small number of survey respondents may be contacted again by telephone, but only for quality control purposes. None of the information you provide during this research will be used for marketing purposes, nor will your personal information be sold or passed on to any third party.

3b. Information we collect about you:

When conducting the interviews, we will automatically collect information about the way the interview was carried out, including the time that it took to complete parts of the interview.

3c. Information we receive from other sources:

Survey respondents will be selected using location sampling. This involves interviewers approaching potential respondents in various locations, introducing the survey and determining whether the person would be eligible to take part in the interview. To identify participants for the qualitative interviews, Ipsos NV and its local partners will approach selected organisations that work with women from Ukraine, to obtain their suggestions for women to interview, including names, telephone numbers, email addresses and/or social media handles (general personal data) in order to introduce the project and agree on an interview.

4. Who is responsible for processing your personal data?

FRA, as controller, is the legal entity responsible for the processing of your personal data and determines the objective of this processing activity. The Head of FRA's Justice, Digital and Migration Unit is responsible for this processing operation.

In addition, FRA's contractor, Ipsos NV, will act on behalf of FRA as its processor, carrying out the survey with the help of its partners listed below, who will act as sub-processors:

- Czechia: MindBridge Consulting
- Germany: Ipsos Germany
- Poland: Ipsos Poland
- [Novatel EOOD Bulgaria](#), which hosts the survey fieldwork tool iField.

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

The processing operation is necessary for the performance of the tasks carried out by the Agency in the public interest in order to achieve the objectives that are necessary for its management and functioning. Namely, implementing the project is part of FRA's tasks under Article 4.1(a) of its amended founding regulation (Regulation (EC) 168/2007, amended by Council Regulation (EU) 2022/555), as implemented by FRA's work programme contained in the Single Programming Document 2023-2025.

Therefore, the processing is lawful under Article 5.1(a) of the Regulation (EU) No 2018/1725.

Moreover, the processing of special categories of personal data is lawful under Article 10.2(j) of the same Regulation, since the processing operation is necessary for scientific research purposes or statistical purposes based on Union Law.

For the voice recording of the pilot and in-depth interviews, the Agency will request the consent of the interviewee and therefore, the processing is also lawful in accordance with Article 5.1.(d) of Regulation (EU) No 2018/1725.

6. Who can see your data?

Although it is not foreseen for FRA to receive personal data during the survey data collection process, the Agency, as data controller, may request access to the personal data processed by the contractor on its behalf. In that case, a restricted number of FRA staff will have access to the collected personal data.

Therefore, the personal data that is necessary for conducting the interviews will only be accessed by a limited number of people – specifically, the interviewers and a restricted number of Ipsos NV staff and its local partner (acting both on behalf of FRA), who are involved in the management of the data collection activities.

Your personal data will be stored separately from your answers in the interview, which will be treated anonymously.

7. Do we share your data with other organisations?

Personal data is processed only by Ipsos NV and its local partners on behalf of FRA. We do not intend to share your data with third parties, but in case we need to do so, you will first be notified to whom your personal data has been shared with.

However, anonymous collected data (NEVER your contact details, or details that could directly or indirectly identify you in any published results) may be shared with third parties for research purposes.

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

No. Your personal data will not be shared with third countries or international organisations.

However, some members of Ipsos NV staff who are involved in the management of the data collection are based in the UK and will have access to your personal data in order to manage the data collection activities (survey and interviews). This processing is lawful under the [EU-UK adequacy decision](#).

Moreover, anonymous collected data will be made available for research purposes with interested researchers as indicated above, including those operating in third countries and international organisations.

9. When will we start the processing operation?

We will start the processing operations related to the interviews in November 2023.

10. How long do we keep your data?

Personal data used to carry out the interviews will be destroyed after the end of the data collection activities and quality control measures, at the latest six months after the end of FRA's contract with Ipsos NV on 16 April 2024. Anonymous interview data will be kept indefinitely for research purposes.

Should selected parts of the interview be monitored/audio recorded for quality control purposes, Ipsos NV will destroy their copy of the recordings (including consent forms, which are stored separately) when they are no longer necessary for quality assurance purposes, once Ipsos NV has met their contractual obligations. FRA will destroy its copy of the recordings (including consent forms, which are stored separately) when they are no longer necessary for quality assurance of the project's research outputs, at the latest after two years from the date of the last recording.

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 FRA at statisticssurveys@fra.europa.eu.

11.1. The value of your consent

Your participation in the interviews is very valuable for us. Since your participation in the interview is voluntary, before the beginning of the survey, you will be asked to confirm that you are willing to start the interview. For the voice recording of the pilot and in-depth interviews we need your consent, which will be collected by the interviewers at the start of the interview. 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

The following rights concern your personal data that is collected and processed as a part of conducting the interviews (general personal data). After your personal data has been deleted, leaving only anonymous research data, your responses can no longer be identified, meaning that it will not be possible to – for example – access or delete your responses.

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 that 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 FRA no longer needs the data for completing their 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 automated decision-making including profiling.

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

FRA and its contractor Ipsos NV, as well as its local partners, have 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 users only.

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

a) The first step is to notify FRA by sending an email to statisticssurveys@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 European Data Protection Supervisor 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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