



MEETING KEY POINTS

2nd Workshop - Frontex implementing rules on Personal Data

Date and time: 28 October 2021, 10:15 - 15:45 (Warsaw local time)

Venue: WEBEX

Workshop Opening

Moderator - [REDACTED] Senior Legal Officer, Legal & Procurement Unit, Frontex

Opening Speech - [REDACTED] Head of Operational Analysis Sector, Risk Analysis Unit, Frontex

Opening Speech - [REDACTED] Head of Legal Services Sector, Legal & Procurement Unit, Frontex

Tour de table - Workshop participants

Module 1: Implementing rules concerning the processing of Operational Personal Data (OPD)

Presentation by [REDACTED] - Legal Officer, Legal & Procurement Unit, Frontex

KEY DISCUSSION POINTS

- The importance and urgency to finalise these rules was stressed
- Definitions: It will be made sure that definitions are in line with the applicable legal framework
- Data Deletion and Data Anonymisation: Further thought will be given to how these concepts are applied in the draft
- Controllorship and joint controllorship: attention will be paid to make sure that the draft is internally consistent and in line with the data protection framework
- Defining the need of processing special categories of personal data was referred to
- Assessing proportionality and necessity in processing certain data as data related to minors will be considered
- Further clarity was offered that the collection of OPD does not occur only during Operations but also during other activities, i.e. monitoring migration flows or conducting risk analysis
- Data collection plan: it was clarified that it will be integrated in the operational plan where one exists (i.e. in the course of Operations). The data collection plan will be binding in that case
- The OPD rules should avoid contradictions between Frontex Implementing Rules and national laws
- Access to operational personal data by the Agency and deletion of data
- The applicability to SAC countries of the relevant EU data protection instruments referred to in the OPD rules will be assessed

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