Dear [Redacted],

I hope this message finds you well. I'm coming back to you with some questions for clarification on the FAR notification:

1) Data fields: the notification mentions that the data fields for returnees are those from the contact list plus the additional ones listed there. Do you also have phone numbers / e-mail addresses of returnees, as this seems to imply?

2) Conservation period/anonymisation: the notification (field 13) states that personal data will automatically be anonymised at the end of the conservation period.
   a. I guess this means eliminating some data fields (name etc.), but keeping other fields for use in statistics. Could you please explain more (which fields are removed, other possible measures [e.g. aggregating dates of birth to only have information on age groups]?)
   b. Does this apply only to returnee data, or to all categories of DS? I guess that information on those MS staff who have an account in FAR will be kept for as long as the account exists (related: do all MS staff involved in a return operation necessarily have a FAR account? E.g. escorts, medical personnel...)
   c. The notification mentions one year in RSU archives and subsequent archiving for paper files, noting that these do not include personal data of returnees – are there other personal processed for FAR in there?

3) Information to DS: in case not all persons in the contact list have a FAR account, how are those who do not have an account informed about the processing of their personal data (e.g. airline contact point, broker)?

4) Security: Please provide additional documentation about the security risk management process in place for FAR (whether complete analysis / information security risk assessment, or standard Frontex assessment + gap analysis)

5) Please explain the relationship between IRMA and FAR - is FAR part of IRMA?

6) True/ex-post: the notification also refers to the now repealed old Frontex Regulation, while your cover message refers to FAR as a "planned processing operation"
   a. Please confirm whether this is a true or an ex-post notification;
   b. If "true", do I assume correctly that the currently used tools are still the ones notified under EDPS case 2009-0281 (JRO), as further explained during the inspection (2014-0273)?

Please note that in accordance with Article 27(4) of Regulation (EC) 45/2001, the case is suspended until receipt of the replies. Please put the functional mailbox (edps@edps.europa.eu) in copy and mention case number 2017-0007, as the date of receipt there is the only date that will be taken into account for lifting the suspension.

Thank you for your cooperation!

Best regards,
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