



PRIVACY STATEMENT REGARDING HR TICKET SERVICE OF THE EUROPEAN INSTITUTE OF INNOVATION AND TECHNOLOGY

This privacy statement provides information on the processing of personal data of EIT staff carried out by the European Institute of Innovation and Technology within the framework of processing requests submitted by the EIT staff through the HR ticket service.

The processing of personal data follows the provisions of Regulation (EU) 2018/1725¹ of the European Parliament and of the Council of 23 October 2018 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 (hereinafter “Regulation”).

What is personal data and what is a personal data processing operation?

Personal data shall mean any information relating to an identified or identifiable natural person (‘data subject’). An identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Processing means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automatic means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Who are the data subjects?

The data subjects are individuals who work for the EIT. This includes temporary agents, contract agents, seconded national experts, trainees and interims.

Who is the controller of the data processing?

The data controller is the Head of Administration Unit at the EIT.

What is the purpose of personal data processing?

EIT uses HR ticket service – as an effective and efficient tool to submit HR-related requests for information and clarification in the following categories:

- 1) Leaves and absences:
 - a) Clarification/information request on annual leave;
 - b) Clarification/information request on sick leave with medical certificate;
 - c) Clarification/information requests on sick leave without medical certificate/submission of request regarding sick leave without medical certificate;

¹ OJ L 295, 21.11.2018, p. 39–98



- d) Clarification/information requests on special leaves;
- 2) Work Patterns:
 - a) Clarification/information requests on all forms of part-time (also including medical part-time) etc., parental leave; family leave; unpaid leave;
 - b) Clarification/information requests on working time and hybrid working.
- 3) Individual rights and entitlements (change in household, marriage, divorce, birth of child):
 - a) Clarification/information requests on individual rights;
 - b) Clarification/information/ requests on payroll matters (payslip).
- 4) Learning and development:
 - a) Clarification/information requests on L&D matters.
- 5) Schooling (school, kindergarten, school transport):
 - a) Clarification/information requests.
- 6) Appraisal:
 - a) Clarification/information requests.
- 7) Reclassification.
 - a) Clarification/information requests.

The data processing operations include the collection, recording, organisation, storage, consultation, use, disclosure by transmission, erasure and destruction of personal data.

The purpose of processing personal data is to process the requests of EIT staff related to HR matters in the categories mentioned above which were submitted through the HR Ticket Service.

The HR ticket service replaces the learning and development, EIT HR and schooling functional mailboxes. The HR ticket also complements SYSPER only in those cases where the functionalities covered by the specific SYSPER module in relation to the categories referred to above are not functioning.

As regards the sick leave without medical certificate, the staff member opens a ticket via the HR ticket service and informs HR. HR registers in Sysper. The schooling enrolment requests related to the submission of the related school year form are submitted directly by the staff member through ARES and not via the HR ticket service.

This privacy statement does not cover the processing of data collected via SYSPER/ARES.

Please consult the Data Protection page on the EIT's website: <https://eit.europa.eu/about-us/legal-framework/data-protection> to find the following privacy statements:

- the Privacy statement regarding the use of SYSPER 2 for the staff of the European Institute of Innovation and Technology
- the Privacy statement regarding the management of leaves for the staff of the European Institute of Innovation and Technology
- the Privacy statement regarding the management of the Annual staff appraisal exercise at the European Institute of Innovation and Technology
- the Privacy statement regarding the management of the Annual staff reclassification exercise at the European Institute of Innovation and Technology
- the Privacy statement for the application of HAN (HERMES-ARES-NOMCOM) IT system at the EIT



What types of personal data are processed?

The personal data provided by data subjects in connection with their requests on the different categories indicated above. Depending on the topic of the request submitted through the HR ticket service, the following types of personal data may be processed for the above-mentioned purposes:

- surname, first name, personnel number, gender, nationality, address, telephone number, place of origin;
- date of birth, marital status, officially recognised registered partnership, identity and date of birth of spouse or partner, identity and date of birth of dependent children and date of adoption if relevant;
- EIT Unit to which the jobholder is assigned, category, grade, status, duration of contract, years of service, unique payroll number (NUP), administrative status and career, job description.

Who has access to the personal data of data subjects and to whom can they be disclosed?

Within the EIT:

The personal data of the data subjects are processed by the EIT authorised staff on the need-to know basis: EIT HR, Head of Administration Unit.

Within the Commission and other EU institutions/bodies/agencies:

The authorized staff that may have access to relevant personal data for audit control or investigation purposes: Court of Auditors, Internal Audit Service of the European Commission, European Anti-Fraud Office (OLAF).

Access to the personal data may be granted also to the European Ombudsman and the European Data Protection Supervisor upon request, the General Court and the European Court of Justice to the extent necessary for handling the review procedure and litigation.

Third parties subject to the GDPR² and third parties not subject to the GDPR:

Exceptionally and if necessary, personal data concerning staff requests requiring interpretation of the SR may be disclosed to DG HR (SYSPER team) and PMO for specific and limited purposes only. EIT has signed SLAs with both parties including a privacy statement.

Exceptionally and if necessary, personal data may be disclosed to third parties, e.g. external lawyers subject to the GDPR, for specific and limited purposes only. In this case a written contract (service contract) is signed between the EIT and the external lawyer in order to ensure that Article 29 of the Data Protection Regulation of the European institutions is respected by the data processor. These written contracts follow the model of the Commission and include a specific article on data protection.

² Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation, OJ L 119, 4.5.2016, p. 1–88)



How long do we keep your data?

The EIT will keep your personal data for a period during which the EIT must preserve a file based on its administrative usefulness and the statutory and legal obligations linked to it according to the EIT Decision No. 35/2021 depending on the category of data, as follows:

Category	Retention period
1) Leaves and absences: <ul style="list-style-type: none"> a) Clarification/information request on annual leave b) Clarification/information request on sick leave with medical certificate; c) Clarification/information request on sick leave without medical certificate//submission of request regarding sick leave without medical certificate; d) Clarification/information request on special leaves. 	<ul style="list-style-type: none"> a) 2 years b) 3 years (possible extension to 5 years in order to cover legal disputes); c) 3 years (possible extension to 5 years in order to cover legal disputes); d) 3 years (possible extension to 5 years in order to cover legal disputes);
2) Work Patterns <ul style="list-style-type: none"> a) Clarification/information requests on all forms of part-time (also including medical part-time) etc., parental leave; family leave; unpaid leave; b) Clarification/information requests on working time and hybrid working. 	10 years
3) Individual rights and entitlements (change in household, marriage, divorce): <ul style="list-style-type: none"> a) Clarification/information requests on individual rights; b) Clarification/information/ requests on payroll matters (payslip). 	5 years
4) Learning and development <ul style="list-style-type: none"> a) Clarification/information requests on L&D matters. 	10 years
5) Schooling (school, kindergarten, school transport): <ul style="list-style-type: none"> a) Clarification/information requests. 	5 years
6) Appraisal: <ul style="list-style-type: none"> a) Clarification/information requests. 	10 years
7) Reclassification: <ul style="list-style-type: none"> a) Clarification/information requests. 	5 years

What are the rights of the data subject?



In accordance with Articles 15, 17, 18, 19 of the Data Protection Regulation of European Institutions the data subjects have the **right for information**, the **right of access**, the **right of rectification** in case their personal data is not complete or not accurate and the **right to erasure** (“right to be forgotten”).

The data subjects have the right to obtain the **erasure** of their personal data in accordance with Article 19 of the Regulation and in particular in the cases when the personal data are no longer necessary in relation to the purposes for which they were collected, if the data subject withdraws its consent, or in case of unlawful processing.

Data subjects have also the **right to restriction** of processing of personal data in accordance with Article 20 of the Regulation, and the **right to object** on grounds listed in Article 23 of the Regulation.

The rights can be only exercised by sending a request in a written form to the EIT-HR@eit.europa.eu. As a general rule, the requests for information, access, rectification, erasure, restriction are handled without undue delay and in any event within one month of receipt of the request; this period may be extended by further two months where necessary, taking into account the complexity and number of requests. In case the data subject contests the accuracy of the data, upon request, the data is restricted immediately for the period of verification of the accuracy of the data.

Restrictions to the rights of data subjects may be applied by the EIT, in accordance with Article 25 of the Data Protection Regulation of the European institutions and the EIT internal rules on restrictions³.

Who should be contacted in case of queries or complaints?

If you have any queries concerning the processing of your personal data, you may address them to the following email: EIT-HR@eit.europa.eu.

You have the right of recourse at any time to the EIT’s Data Protection Officer (EIT-DPO@eit.europa.eu) and to the European Data Protection Supervisor (EDPS@edps.europa.eu) or contact the site: <http://www.edps.europa.eu/EDPSWEB/>.

Legal basis of the processing operation

General legal basis:

- Staff Regulations of Officials and the Conditions of Employment of Other Servants of the European Economic Community and the European Atomic Energy Community and Staff Regulations of Officials of the European Union ('Staff Regulations') and the Conditions of Employment of Other Servants of the European Union ('CEOS'), laid down by Council Regulation (EEC, Euratom, ECSC) No 259/681.
- Commission Decision C(2022) 1788 of 24.3.2022 on Working time and hybrid working
- Commission Decision C(2020) 1559 of 16.3.2020 amending Decision C(2013) 9051 of 16 December 2013 on leave

³ Currently under adoption. The final version will be published at the following link: <https://eit.europa.eu/who-we-are/legal-framework/data-protection>



Specific EIT legal basis:

- Decision 35/2021 of the Director of the European Institute of Innovation and Technology (EIT) of 11 November 2021 on the document management implementing rules at the European Institute of Innovation and Technology
- Decision 24/2018 of the Governing Board of the European Institute of Innovation and Technology (EIT) of 28 June 2018 on the implementation of the framework for learning and development
- Decision 15/2022 of the Governing Board of the European Institute of Innovation and Technology (EIT) of 29 April 2022 on the application by analogy of Commission Decision C(2022) 1788 on Working time and hybrid working
- Decision 02/2021 of the Governing Board of the European Institute of Innovation and Technology (EIT) of 22 February 2021 on the application by analogy of Commission Decision C(2020) 1559 of 16.3.2020 amending Decision C(2013) 9051 of 16 December 2013 on leave
- Decision 27/2021 of the Director of the European Institute of Innovation and Technology (EIT) of 7 July 2021 on Schooling fees and transport costs
- Decision 27/2021 of the Director of the European Institute of Innovation and Technology (EIT) of 9 July 2021 on Pre-school allowances and transport costs
- Decision 17/2016 of the Governing Board of the European Institute of Innovation and Technology (EIT) of 24 June 2016 laying down general implementing provisions regarding article 87(3) of the Conditions of Employment of Other Servants of the European Union
- Decision 18/2016 of the Governing Board of the European Institute of Innovation and Technology (EIT) of 24 June 2016 laying down general implementing provisions regarding article 54 of the Conditions of Employment of Other Servants of the European Union
- Decision 18/2015 of the Governing Board of the European Institute of Innovation and Technology (EIT) of 3 June 2015 on laying down general provisions for implementing article 43 of the Staff Regulations and implementing the first paragraph of article 44 of the Staff Regulations for temporary staff
- Decision 19/2015 of the Governing Board of the European Institute of Innovation and Technology (EIT) of 3 June 2015 on laying down general provisions for implementing article 87(1) of the conditions of employment of other servants of the European Union and implementing the first paragraph of article 44 of the Staff Regulations

Grounds for lawfulness

In line with Article 5(a) of Regulation No. (EU) 2018/1725, 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 EIT.