



**Record¹ of processing activities
regarding the management of personal files of the staff
of the European Institute of Innovation and Technology**

Nr	Item	Description
1	Reference number	DPO-09
2	Name of the data controller, the data protection officer and processor ² , if applicable and contact details	<p>The data controller is the Head of the Administration Unit of the EIT. Contact e-mail: (EITHR2@eit.europa.eu).</p> <p>Contact e-mail of the Data Protection Officer: EIT-DPO@eit.europa.eu</p> <p>The data processors are:</p> <p>DG HR as system owner of NDP-Personal file (HR-MAILA3@ec.europa.eu); DG DIGIT as system supplier providing technical support (DIGIT-NDP-TECH-SUPPORT@ec.europa.eu).</p>
3	Purposes of the processing	The purpose of the processing operation is to collect and process personal data of the EIT staff, as well as data received from other institutions/bodies/agencies in the context of inter-institutional mobility, in the module NDP personal files in order to keep them accurate, to ensure their confidentiality and to facilitate access to these files by the data subjects and by authorized

¹ In line with article 31 of Regulation (EU) 2018/1725 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

² For more information., please see below (categories of data recipients).



		<p>persons for human resources management purposes. The processing is required to ensure proper and efficient management of HR matters for the staff working for the EIT.</p> <p>In order to facilitate the digital management of personal files in general, EIT is going to use the NDP – Personal Files Module under SYSPER provided by DG HR as System owner and supported by DG DIGIT as system supplier.</p> <p>NDP-personal files allows to create files, allows for the digitalization and uploading of documents, the printing of a whole file or part of it, the moving of a document within a file following an indexing error or to another file (following a data breach for example), the deletion of documents, the creation and granting of access rights to file managers. However, it does not allow any profiling or statistical analysis in relation to personal data. Therefore, your personal data will not be used for an automated decision-making including profiling.</p> <p>The files of active EIT staff stored in paper and electronic form will be transferred to the NDP enabling staff in active employment to freely consult their personal file in a secure manner via SYSPER application due to the computerization of the personal file via NDP application (Numérisation des Dossiers Personnels), except for seconded staff, whose data is processed by the Commission. Personal files regarding Temporary and Contract staff are no longer kept in electronic and paper form.</p> <p>Personal files of former staff³ will be kept in paper and electronic form and will not be transferred to the NDP tool.</p> <p>The data processing operations include collection, recording, organisation, storage, consultation, use, disclosure by transmission, erasure and destruction of personal data.</p>
4	Categories of data subjects	<p>Data subjects include Temporary and Contract staff, seconded staff, whose data is processed by the Commission working for the EIT, as well as family members of staff members: parents, grandparents, children, spouses (and assimilates, recognized legal partner, civil partnership) and potentially any other depending from the staff member.</p>

³ Former staff on the moment of launching the NDP tool.



5	Categories of the personal data processed	<p>The personal file saved under NDP may contain the following documents:</p> <p>a) Part I – "Document for the Application for posts"</p> <ul style="list-style-type: none"> • Application file, Application form; CV; • Study certificates: copies of the diploma(s) attesting a successful completion of the required level of education and of any other diplomas obtained; documents proving third language; courses/languages/training certificates; • Employment certificates: evidence of the candidate's professional experience clearly indicating starting and finishing dates and the nature of the duties carried out (e.g. employment contracts, employers' references, pay slips); • Recruitment files (correspondence: Offer letter, letter of acceptance; Vacancy notice, Job description) • Medical fitness (certificate) • Computing patronymic <p>b) Part II – "Career: Engagement"</p> <ul style="list-style-type: none"> • Determination of professional experience, grading • Contract: Contract of Employment, Contract decision, visa, routing slip, acknowledgement of receipt • Appointment: decision, visa (routing slip), acknowledgement of receipt • Interinstitutional transfer decisions • Amendments and Extensions of Contract: Contract renewal, decision (incl. mobility inside the agency), visa (routing slip), acknowledgement of receipt, Statement. • Report on the Probationer/Extensions (Report on the Probationary Period + objectives) • Establishment Decision: decision, visa (routing slip) acknowledgement of receipt • Reinstatement following invalidity: decision, acknowledgement of receipt. <p>c) Part III – "Career: Development"</p> <ul style="list-style-type: none"> • Promotions: decision, visa, routing slip, acknowledgement of receipt, miscellaneous
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⁴ Only in cases where there is a decision in favour of the staff member regarding rights and entitlements.



	<ul style="list-style-type: none"> • Disciplinary matters (incl non-disciplinary warning) • Restriction on recruitment • Miscellaneous (Staff Reports) <p>e) Part V: Private file</p> <ul style="list-style-type: none"> • Personal and family documents: Birth certificates, Nationality/Identity card/Passport; Change of name/first name, residence certificates (MFA card), Criminal record, Military Service Certificate/Civil Service, Marriage certificate, Birth certificate of the children, adoption/recognition of a child/child under guardianship; members of the household, death certificate, divorce/separation/custody, life community certificate/Partnership, civil status certificate, driving license. • Bank information/Legal entity (LEF, BAF); • Entry into service: Note for the File (Checklist Ex Ante), acknowledgement of receipt/Declaration Rights and Obligations, Establishment of rights (financial), Settlement of individual entitlements, PMO declaration forms, JSIS confidential declaration form, declaration of arrival. <p>f) Decisions not related to Career</p> <ul style="list-style-type: none"> • Rights relating to personal matters: (CDCE+CONS) allowances/Household/Dependent child/Education/ABI/APP, Household Allowance (Employment certificate of spouse), Pay slip from spouse, Dependent Child Allowance, Education Allowance (contribution request form, attendance certificate), Allowance for person treated as dependent child, Allowance perceived from other sources, Tax deduction, foreigners buying a car have VAT exemption, Recognised partnership (Sickness Insurance); • Determination of Place of origin: Fixing of Place of Origin, Request to change the place of origin, Revision/Change of Place of Recruitment, Annual travel expenses; • Rights relating to Entry into Service/Transfer/Interinstitutional Transfer: Determination of the financial entitlements (salary transfer); travel expenses; removal; installation allowance; daily allowance (DSA = Daily Subsistence Allowance);
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	<ul style="list-style-type: none"> • Rights relating to Termination of Service: Change of the place of recruitment, travel expenses; removal, Resettlement Allowance, Liquidation of financial effect. <p>g) Other</p> <ul style="list-style-type: none"> • Personal information sheet; • Address and Person to inform; • Pension rights; • Control Documents on End of service/Transfer (Leaving form - transfer/Termination/CCP); • Miscellaneous - Private File. <p>Special categories data (Article 10 of the Data Protection Regulation of the European institutions)</p> <p>In accordance with Article 26 of the Staff Regulations, the personal file shall contain no references to the staff member's political, trade union, philosophical or religious activities and views, or to his racial or ethnic origin or sexual orientation.</p> <p>However, the personal file of the staff member contains the following documents which may contain some personal data falling under the special categories of personal data (Article 10 (1) of the Regulation):</p> <ul style="list-style-type: none"> - Medical fitness (which might indirectly reveal data concerning the health of the staff member), - Marriage or legal cohabitant certificate (which may indirectly reveal data concerning natural person's sexual orientation), - Birth certificate and children certificate (which may indirectly reveal data concerning racial or ethnic origin), - Request and decision taken upon Art. 15 SR (which may indirectly reveal data concerning political opinion or orientation),
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		<ul style="list-style-type: none"> - Request and decision taken upon Art. 12b - 16 SR on activities may contain information related to personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership - Decision on invalidity (which by nature reveals data concerning health of the staff member) - Copy of passport or ID containing some biometrical data or information regarding religious beliefs of the staff member (which may indirectly reveal racial or ethnic origin and, biometric data). <p>Such data are processed according to Article 10 (2) b) of the Regulation (the processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment).</p>
6	Categories of data recipients	<p>Within the EIT:</p> <p>The access to the personal data is determined by strict rules according to the role and responsibilities of the different actors and is based on the needs of the procedure. Access rights to the NDP application are therefore governed by the principle of the need to know.</p> <p>Access is granted to the staff member who consults his/her personal file in accordance with Article 26 of the Staff Regulations.</p> <p>The personal data of data subjects is processed by the EIT HR Section staff (with permanent or restricted access depending on the role).</p> <p>Exceptionally, if necessary and following a case by case assessment, the following actors may receive access to personal data of data subjects: EIT Director, EIT Legal Officer (s), in the context of complaints submitted under Article 90 (2) of the Staff Regulations, administrative inquiries and disciplinary proceedings, OLAF cases and/or litigation.</p> <p>Within the Commission and other EU institutions/bodies/agencies:</p> <p>The authorized staff that may have ad hoc and time-limited access to one or more relevant personal data on the basis of a justified request from the superior of the file manager to the</p>



	<p>personal file sector (e.g. audit control or investigation purposes): Court of Auditors, Internal Audit Service of the European Commission, the Directorate-General for Human Resources and Security (DG HR), European Anti-Fraud Office (OLAF).</p> <p>DG HR (in the context of the creation of the personal file) and DG DIGIT (when providing technical support) act as data processors and process the personal data only on behalf and upon instructions of the EIT.</p> <p>For the purpose of providing the recruited EIT staff with the financial entitlements, part of the personal data provided by the data subjects is disclosed to the Payment Master's Office (internal service of the European Commission responsible for the financial entitlements of staff of the Commission and certain other EU institutions/agencies/bodies</p> <p>In case of transfer to another EU institution/agency/body, staff member in charge of personal files in this EU institution/agency will receive access to the personal data of data subjects in the event that the personal file has been transferred.</p> <p>For the purpose of handling review procedures and litigation, access to the personal data may be granted to the European Ombudsman, the European Data Protection Supervisor, the General Court and the European Court of Justice upon request and to the extent necessary for handling the review procedure and litigation.</p> <p>Third parties subject to the GDPR⁵ and third parties not subject to the GDPR:</p> <p>Exceptionally and if necessary, information concerning the management of personal files may be disclosed to external lawyers (advocates) 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 EU institutions</p>
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⁵ 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)



		<p>is respected by the data processor. These written contracts follow the model of the Commission and include a specific article on data protection.</p> <p>The same applies to external IT contractors with whom the EIT has a framework contract in order to provide IT services for the EIT.</p>
7	Time limit storage	<p>The personal data stored in the personal files (in paper and electronic form) will be retained for a period of <u>10 years as of the termination of employment or as of the last pension payment</u>. The EIT will lose access to the NDP file in case of transfer of the staff member to another EU institution. In case the staff decides not to continue her/his career within the EU institutions/EU agencies, his/her personal file will be stored in the NDP tool in ‘transfer status’, e.g., that the EIT and any EU institution/EU agency will not be able to consult the personal file.</p> <p>The criminal record is handed back to the staff member immediately upon recruitment or within <u>maximum 6 months</u>.</p> <p>The personal files are stored in NDP tool for the time necessary to fulfil the purpose of collection or further processing, namely for at least 100 years after the recruitment of the person concerned and 8 years after the termination of the rights of the beneficiaries concerned.</p>
8	If applicable, transfers of personal data to a third country or to international organization (if yes, the identification of that third country or international organization and the documentation of suitable safeguards)	No
9	General description of the technical and organisational security measures	<p>Organisational measures: the personal data of the data subjects is processed by the responsible EIT staff mentioned above.</p> <p>Technical measures: hardcopy files are kept in the locked cupboards. Electronic data is stored on EIT network drive and NDP tool, and is only accessible to the persons mentioned in the previous paragraph.</p>



10	For more information, including how to exercise rights to access, rectification, object and data portability (where applicable), see the privacy statement:	Please see the privacy statement annexed to the record as Annex. Please consult the Data Protection page on the EIT's website: https://eit.europa.eu/who-we-are/legal-framework/data-protection
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Signature of the data controller

(Approval is given via a workflow in ARES in place of a handwritten signature)

Annex: Privacy statement