



## PRIVACY STATEMENT ON THE PROCESSING OF PERSONAL DATA VIA THE EIT DATA PORTAL AT THE EUROPEAN INSTITUTE OF INNOVATION AND TECHNOLOGY (EIT)

This privacy statement provides information on the processing of personal data carried out by the European Institute of Innovation and Technology in the area of grant management, in particular regarding the use of EIT Data Portal <sup>1</sup>

The processing of personal data follows the provisions of Regulation (EU) 2018/1725<sup>2</sup> 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 the:

- staff of the start-up grant beneficiaries and other participants (start-up coordinator, consortium members, affiliated entities, subcontractors): e.g. legal representatives, contact persons and other staff members;
- staff of the grant beneficiaries and other participants (KIC Legal Entity (LE), KIC partners, affiliated entities, as well as third parties like subcontractors, subgrantees etc.): e.g. legal representatives, contact persons and other staff members;
- the subcontractors and subgrantees themselves in case they are natural persons;

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<sup>1</sup> Access to the EIT Data Portal is available through a Microsoft 365 account. Internal users with an EIT account and external users (Guests- KICs) log in using this method. All data processing activities related to user authentication and account management are governed by a separate Privacy Statement:

[https://www.eit.europa.eu/sites/default/files/privacy\\_statement\\_it.pdf](https://www.eit.europa.eu/sites/default/files/privacy_statement_it.pdf)

<sup>2</sup> OJ L 295, 21.11.2018, p. 39–98



- participants engaged in degree (students) and non-degree training programs, graduates;
- EIT staff (including interims and trainees.)

### **Who is the controller of the data processing?**

The data controller is the **EIT Director**.

### **What is the purpose of the personal data processing?**

The purpose of processing personal data is to enhance efficiency of grant management at the EIT through the use of the EIT Portal, specifically by optimising data collection, validation, approval, export, and document repository operations.

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

### **What types**

The following types of personal data are processed for the above-mentioned purposes in accordance with the Regulation:

- First name, last name
- Gender
- E-mail
- Country
- City
- Address
- PIC
- Signature
- EIT login credentials (EIT login accounts both for internal users and external users)
- other incidental and unsolicited data, including special categories of data - data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health or sexual orientation may be received only in as much as this data appears spontaneously in the CV, photos, biographies provided by the data subjects.

### **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 is processed by the EIT authorised staff on the "need to know" basis.

#### **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 GDPR<sup>3</sup> and third parties not subject to the GDPR:**

Exceptionally and if necessary, personal data concerning grant implementation may be disclosed to *external lawyers (advocates), IT contractors* subject to the GDPR for specific and limited purposes only.

EIT has concluded with the IT contractor UNISYSTEMS the Framework Contract EIT/2023/OP/0002<sup>4</sup> with the purpose of facilitating the EIT Portal development. The personal data may be disclosed to the designated staff of the IT contractor, that are bound by non-disclosure declarations.

### **How long do we keep your data?**

The EIT only keeps your personal data for the time necessary to fulfil the purpose of collection or further processing, namely for **7 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-KIC-Operations@eit.europa.eu](mailto:EIT-KIC-Operations@eit.europa.eu). As a general rule, the requests for information, access, rectification, erasure

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<sup>3</sup> 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)

<sup>4</sup> Ares(2025)4387613)



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, not exceeding on month.

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 restrictions<sup>5</sup>.

### **Who should be contacted in case of queries or complaints?**

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:**

- Regulation (EU) 2021/819 of the European Parliament and of the Council of 20 May 2021 on the European Institute of Innovation and Technology (recast);<sup>6</sup>
- Regulation (EU, Euratom) 2024/2509 of the European Parliament and of the Council of 23 September 2024 on the financial rules applicable to the general budget of the Union (recast)(hereinafter – EU Financial Regulation), in particular Title VII thereof;<sup>7</sup>
- Commission Delegated Regulation (EU) 2019/715 of 18 December 2018 on the framework financial regulation for the bodies set up under the TFEU and Euratom Treaty and referred to in Article 70 of Regulation (EU, Euratom) 2018/1046 of the European Parliament and of the Council (hereinafter – Framework Financial Regulation).<sup>8</sup>

#### **Specific EIT legal basis:**

- Decision of the Governing Board of the European Institute of Innovation and Technology of 25 September 2019 on the financial regulation of the EIT;<sup>9</sup>
- EIT Annual work programmes included in the Single Programming Decisions (financing decisions), as adopted by the EIT Governing Board.
- Contribution agreements within the meaning of Article 7 of the Framework Financial Regulation, concluded between the EIT, on one side, and the European Commission Directorates-General, or Member States, or autonomous regions of Member States, on the other side.<sup>1</sup>

### **Grounds for lawfulness**

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<sup>5</sup> Currently under adoption. The final version will be published at the following link: <https://eit.europa.eu/who-we-are/legal-framework/data-protection>

<sup>6</sup> OJ L 189, 28.5.2021, p. 61–90

<sup>7</sup> OJ L, 2024/2509

<sup>8</sup> OJ L 122, 10.5.2019, pp. 1–38

<sup>9</sup> Ares(2019)6810859



In line with Article 5. 1) (a) of the Data Protection Regulation, 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.

In line with Article 5. 1) (d), all applicants and beneficiaries, submitting a proposal and providing information including personal data to the EIT by any means (in particular by paper or electronic form) are deemed to have unambiguously given their consent for the subsequent processing operations in application of the Data Protection Regulation.

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<sup>i</sup> The portal is not currently used for processing data related to contribution agreements; however, its use for this purpose is planned.