

**Record of processing activities by the European Institute of Innovation and Technology (EIT)
for grant management with the Knowledge and Innovation Communities (KICs),
including the use of eGrants**

Nr	Item	Description
1	Reference number	DPO-19
2	Name of the data controller, the data protection officer and processor, if applicable and contact details	<p>The data controller for grant management is the EIT Director.</p> <p>eGrants¹: The EIT acts as a joint controller with the European Commission (Directorate-General for Research and Innovation) for the personal data processing operations carried out within the Single Electronic Data Interchange Area (SEDIA) Corporate Initiative, as covered by the Joint Controllership Arrangement.²</p> <p>Contact e-mail for the data controller: EIT-KIC-Operations@eit.europa.eu or EIT-Director@eit.europa.eu.</p> <p>Contact e-mail of the EIT Data Protection Officer: EIT-DPO@eit.europa.eu</p>
3	Purposes of the processing	<p>The following purposes of data processing can be defined as:</p> <ul style="list-style-type: none"> • to award and manage (including monitoring and supervision and evaluation) the grants for the designated Knowledge and Innovation Communities ('KICs'): <ul style="list-style-type: none"> ○ start-up grants,

¹ Privacy statement of the Funding and Tenders Portal is available here: https://ec.europa.eu/info/funding-tenders/opportunities/docs/2021-2027/common/ftp/privacy-statement_en.pdf

² Ares(2024)3319347

		<ul style="list-style-type: none"> ○ grants to the KICs under Partnership Agreement (PA), including the grants for the implementation of Cross-KIC activities and the activities of the EIT Higher Education Initiative (EIT HEI), ○ grants to the KICs under Memorandum of Cooperation (MoC), ○ grants under Contribution Agreements³ 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 <ul style="list-style-type: none"> ● to award and manage (including monitoring and supervision and evaluation) the grants for the National Contact Points (NCPs); ● to manage all the grants in eGrants (or exceptionally on paper); ● to inform relevant stakeholders about activities, updates, and outcomes related to grant management; ● to handle complaints related to grant management. <p>With reference to Article 3(3) of the Regulation, the data processing operations include the collection, recording, organisation, storage, consultation, use, disclosure by transmission, erasure and destruction of personal data.</p> <p>In particular, during the grant management processes personal data are received, they may be distributed to external experts and the EIT Governing Board, they are evaluated, stored, implemented, and eventually destroyed. The data provided by the beneficiaries, which may include personal data, are used for the preparation, conclusion and implementation of the resulting grant agreements.</p> <p>Note: this privacy statement does not cover the personal data processing operations relating to the:</p> <ul style="list-style-type: none"> ● calls for KICs (i.e. calls for proposals which result in the selection and designation of
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³ Contribution Agreements are concluded between EIT on one side and the European Commission Directorates-General, or Member States, or autonomous regions of Member States, on the other side, that are personal data recipients (e.g. through reports) with aim to oversight the execution of the respective Agreements.

		<p>new KICs);</p> <ul style="list-style-type: none"> • selection and management of experts; • ex-ante and ex-post controls and audits of grant beneficiaries and recipients of the EIT; • use of EIT Portal; • access to documents; • handling of OLAF cases; • EIT Awards; • use of the Partner In and Out (PIO) tool for onboarding services. <p>These processing operations are subject to separate privacy statements⁴.</p> <p><u>Grounds for lawfulness</u></p> <p>In line with Article 5(1)(a) of the 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.</p> <p>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.</p>
4	Categories of data subjects	<p>Data subjects are natural persons whose personal data may be included in the applications, in the different agreements listed above and their respective amendments, and whose data are processed during or after the lifecycle of the grants.</p> <p>Therefore, the data subjects are the:</p>

⁴ Available here: <https://eit.europa.eu/who-we-are/legal-framework/data-protection>

Privacy statements regarding the EIT portal and PIO tool are being adopted and will be published at the same link once available.

		<ul style="list-style-type: none"> • 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 staff of subcontractors, or subcontractors who are natural persons; • participants engaged in degree (students) and non-degree training programs, graduates.
5	Categories of the personal data processed	<p>[I] Identification data:</p> <ul style="list-style-type: none"> • first name, middle name, last name; • gender; • title; • nationality; • country of origin, country of residence (applicable for students engaged in degree and non-degree training programs); • Participant Identification Code (PIC) (when the participant is a natural person); • ID document number (passport/other); • position/function, grade; • signature. <p>[II] Contact data:</p> <ul style="list-style-type: none"> • EIT Extranet login credentials; • e-mail; • phone number. <p>[III] Data necessary for management of procedural/evaluation/performance related aspects:</p> <ul style="list-style-type: none"> • exclusion criteria related personal data (including declaration on honour and extracts from judicial records for natural persons);

		<ul style="list-style-type: none"> • selection and award criteria(if applicable); • performance related personal data linked to legal commitment with the EIT (such as quality of performance of participant (if a natural person) or participant’s staff during the execution of relevant legal commitment with the EIT, information linked to participation to meetings); • any other procedural (application, evaluation process related, project reporting and monitoring etc.) data that is of personal nature and linked to points listed above (including role in the project). <p>[IV] Other incidental and unsolicited data:</p> <ul style="list-style-type: none"> • third party personal data: the supporting documents submitted may contain personal data of third persons (such as other experts mentioned in proposals, board members etc.) not necessary for purposes of processing in grant management; • (references to) personal data freely available on social networks and the Internet; • 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 provided by the data subjects. This data is not processed during the management of the grant agreements, since it is not pertinent.
6	Categories of data recipients	<p>- Within the EIT:</p> <p>a. Within the responsible department/ unit, data is disclosed to the relevant staff members responsible for the operational tasks (e.g. Heads of Department, Heads of Unit, Heads of Section, Programme Officers, Monitoring and Evaluation Officers, Innovation Officers, Education Officers, Grant Assurance Officers, Programme/Project/Policy Support Officers, Assistants and Trainees).</p> <p>b. Outside the responsible departments/units, data may be disclosed to the relevant staff members of the Administration Unit (Heads of Sections, Finance Officer, IT</p>

	<p>Officer, Assistants), Directorate (Director, Heads of Section, Legal Officers, Internal Control Coordinator, Governance Officer, Project Support Officers, Assistants and Trainees), Communications and Engagement Unit (Head of Unit, Heads of Section, Communication Officers, Public Affairs Officers, Assistants and Trainees).</p> <p>c. Personal data may be disclosed to the members of the EIT Governing Board (EIT GB), if necessary for the decisions to be taken by the EIT GB.</p> <p>d. Access to the personal data may be given to the authorised staff of the European Union Agency for Fundamental Rights (FRA) staff, the Accounting Officer and the Deputy Accounting Officer.</p> <p>- Within the European Commission and other EU institutions and bodies:</p> <p>a. Personal data is managed in the IT tools of the Commission, therefore the data are accessible by European Commission (DG RTD, DG BUDG, DG EMPL, DG GROW, DG INTPA, Commission Delegations, etc.).</p> <p>b. To the unit in European Commission Directorate-General Education and Culture of the Commission (DG EAC, partner DG of the EIT), responsible for the supervision of the EIT.</p> <p>c. For the purpose of safeguarding the financial interests of the European Union: Data may be disclosed to the Internal Audit Services of the European Commission (IAS), the European Anti-Fraud Office (OLAF), the European Commission's Legal Service (SJ), the European Court of Auditors (ECA), the European Public Prosecutor's Office (EPPO), upon request and only if necessary in the context of official investigations, litigations, or for audit purposes.</p> <p>The Commission's privacy statement for grant management is available at: https://ec.europa.eu/dpo-register/detail/DPR-EC-05067</p>
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	<p>d. Data may be disclosed to the Evaluation Review Committee (with a representative of the Commission), the European Ombudsman, the European Data Protection Supervisor, the Legal Service of the Commission, Central Legal Support Service of DG RTD, the General Court, the European Court of Justice upon request and only if necessary in the context of handling the complaint/court case.</p> <p>e. For the purpose of translation: Data may be disclosed to the Translation Centre.</p> <p>Data processors subject to the GDPR⁵ and data processors not subject to the GDPR:</p> <p>a. Proposals and the Interim and Final Grant Reporting documents and other documents related to grant management, monitoring and evaluation and review activities may be disclosed to <i>external experts</i> for evaluation tasks. External experts or external consulting entities that support EIT in such tasks are the designated data processors in the grant management conducted by the EIT.⁶</p> <p>b. Exceptionally and if necessary, information concerning the grant implementation may be transferred to <i>external lawyers (advocates), IT contractors</i> subject to the GDPR for specific and limited purposes only.</p> <p>c. The EIT does not transfer any personal data to entities established in third countries, not subject to GDPR. However, in exceptional cases:</p> <ul style="list-style-type: none"> - During and after the grant management cycle documents are given to <i>external experts</i> for evaluation purposes and exceptionally some external experts may come from third countries.
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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, OJ L 119, 4.5.2016, p. 1–88)

⁶ Privacy statement regarding the selection and management of experts is available here: <https://www.eit.europa.eu/about-us/legal-framework/data-protection>

		<ul style="list-style-type: none"> - if necessary, information concerning the grant agreement implementation may be transferred to <i>external lawyers (advocates), IT contractors</i> established in third countries not subject to GDPR, for specific and limited purposes only. <p>In all these cases a written contract (an expert contract or a service contract) is signed between the EIT and the external expert/external lawyers/IT contractor in order to ensure that Article 29 of the Regulation is respected by the data processor. These written contracts follow the model of the Commission and include a specific article on data protection.</p>
7	Time limit storage	<ul style="list-style-type: none"> - Core documents regarding the award of grants and implementation of grant agreements, and documents regarding the relations with KICs (including Forum documents) are stored for 15 years and shall be then transferred to the Historical Archive of the European Union.⁷ - Supporting documents regarding the award of grants and implementation of grant agreements are stored for 7 years and shall be then eliminated. - Criminal/ judicial records are kept for maximum 2 years after the end of the proceedings and then shall be eliminated.
8	If applicable, transfers of personal data to a third country or to international organisation (if yes, the identification of that third country or international organization and the documentation of suitable safeguards)	Please see “ Categories of data recipients ”

⁷ For KICs with which MoC were concluded, the retention period for personal data may be extended until the end of the MoC

9	<p>General description of the technical and organisational security measures</p>	<p>Organisational measures: include restricting access to the personal data solely to authorised persons with a legitimate need-to-know for the purposes of this processing operation.</p> <p>Technical measures: appropriate actions to address online security, risk of data loss, alteration of data or unauthorised access; all personal data in electronical format is stored on the secured servers</p>
10	<p>For more information, including how to exercise rights to access, rectification, object and data portability (where applicable), see the data protection notice:</p>	<p>Please consult the Data Protection page on the EIT's website: https://eit.europa.eu/who-we-are/legal-framework/data-protection</p>