

Privacy statement on subscription to the European Institute of Innovation and Technology (EIT) Newsletter

This privacy statement provides information on the processing of personal data of EIT Newsletter subscribers carried out by the European Institute of Innovation and Technology (EIT).

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 persons who subscribe to the EIT Newsletter.

Who is the controller of the data processing?

The data controller is the Head of Communications and Stakeholder Relations Unit of the EIT.

What is the purpose of the personal data processing?

¹ OJ L 295, 21.11.2018, p. 39-98

The purpose of processing personal data, in the case of the EIT Newsletter, is to allow persons to subscribe to the EIT Newsletter. The data subjects may unsubscribe any time.

If a person wishes to have access to the EIT Newsletters but does not want to share his/her email address, the EIT Newsletter can be accessed directly at eit.europa.eu/news-events/newsletters.

The data processing operations include the collection, recording, organisation, storage, consultation, use, disclosure by transmission, erasure and destruction of personal data. In particular, the personal information of subscribers is accessed, stored, and eventually destroyed.

What types of personal data are processed?

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

- email address.

IP addresses are not processed for the above-mentioned purposes.

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 EIT authorised staff: EIT website administrators in the performance of their duties.

Access will be given to the Internal Auditor of the EIT by request if necessary, for the performance of the duties of the Internal Auditor.

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

The authorised 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 the EIT Newsletter subscribers may be disclosed to the EIT's website contractor, Eworx SA, for specific and limited purposes only. The personal data are stored on its servers based in Europe. The written Framework Contract between the EIT and EWORX S.A. follows the contract model of the European Commission and contains several provisions on personal data protection.³

How long do we retain your data?

The EIT retains your personal data for the time necessary to fulfil the purpose of subscribing to the EIT Newsletter. This means that personal data will be retained only for as long as a subscriber wishes to receive the EIT Newsletter. Personal data will be destroyed upon a subscriber choosing to unsubscribe.

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").

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 <https://eit.europa.eu/contact>. 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 a 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 one 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 restrictions⁴.

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)

³ For more information, please see <https://www.eworx.gr/?i=eworx.en.privacy>

⁴ Currently under adoption. The final version will be published at the following link: <https://eit.europa.eu/who-we-are/legal-framework/data-protection>

Who should be contacted in case of 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 (EC) No 294/2008 of the European Parliament and of the Council of 11 March 2008 establishing the European Institute of Innovation and Technology⁵, as amended by Regulation (EU) No 1292/2013 of the European Parliament and of the Council of 11 December 2013⁶; and in particular Article 5 point j).

Specific EIT legal basis:

- Framework Contract No 03/2017/EITPROC concluded by and between the EIT and Eworx S.A.

Grounds for lawfulness:

In line with Article 5(a) of Regulation No (EU) 2018/1725, the processing of personal data 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.

Furthermore, processing is also lawful based on Article 5(d) of Regulation No. (EU) 2018/1725, since subscription to the EIT Newsletter, is entirely voluntary and is based on the explicit consent of the data subjects (by ticking the box) and the data subjects may unsubscribe any time.

⁵ OJ L97 of 09.04.2008, p. 1-12

⁶ OJ L347 of 20.12.2013, p. 174-184