



**Record¹ of processing activities
regarding the management of European commission
badges (“Laissez-passer”)
at the European Institute of Innovation and Technology**

Nr	Item	Description
1	Reference number	DPO-38
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 Services and Finance Unit.</p> <p>Directorate-General HR and Security (DG HR) of the European Commission acts as processor of the personal data.</p> <p>Contact e-mail of the Data Protection Officer: EIT-DPO@eit.europa.eu</p>
3	Purposes of the processing	<p>The purpose of processing personal data is to be able to issue an EC badge by DG HR to the data subject. The access to Commission premises is granted on a need-to-access basis only.</p> <p>This means that every EIT staff member requesting access to Commission premises must have a valid reason if such access is to be granted. Such reasons and needs may be but are not limited to:</p> <ul style="list-style-type: none"> • professional activities in direct relation to Commission activities that require daily or regular access to Commission premises, such as policy or operational work;

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).



		<ul style="list-style-type: none"> • professional activities in indirect relation to Commission activities that require daily, regular, occasional or interim access to Commission premises, such as maintenance works, catering or any other Commission contract-based services on Commission premises; • an invitation from Commission services, authorised Commission staff members or other duly authorised EU bodies to participate in conferences or meetings on Commission premises on an occasional basis; • educational, cultural or other events, visits or meetings on an occasional basis organised by the Commission on its premises; • occasional access to Commission premises for administrative matters. <p>Therefore, EC badges are issued to EIT staff members who conduct professional or administrative activities in direct or indirect relation to the Commission or EU policies. The layout of the EC badge varies from one EU institution or body to the other.</p> <p>As an initial step, the data subject fills and signs a form which is then approved by the Local Security Officer and DG HR as well. One copy of the form remains in the possession of the LSO. The costs of producing a badge is invoiced by DG HR to the EIT.</p> <p>The data processing operations include the collection, storage, consultation, use, disclosure by transmission, erasure and destruction of personal data.</p>
4	Categories of data subjects	<p>The data subjects are the EIT staff members who in active service, directly employed by the EIT as temporary agent or contract agent and who request the European Commission (EC) badge (“Laissez-passer”), and to some extent, the Local Security Officer (LSO) of the EIT.</p>
5	Categories of the personal data processed	<p>The following types of personal data are processed for the above-mentioned purposes in accordance with the Regulation:</p> <p>1) Application form: Title: M, Mrs, Ms, last name, first name, family name, birth date, nationality, personal number, status: seconded official, contract agent, temporary agent, contract type: permanent contract, fixed-term contract (end date), signatures of the LSO and the data subject</p>



		2) EC badge: personal number, picture of the person, M, Mrs, Ms, last name, first name, family name.
6	Categories of data recipients	<p>Within the EIT:</p> <p>The personal data of the data subject is processed by the Local Security Officer, the Head of Services and Finance Unit (data controller), the EIT Director and Directorate staff have access to the personal data. 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.</p> <p>Within the Commission and other EU institutions/bodies/agencies:</p> <p>The EIT signed an Service Level Agreement (SLA) with DG HR of the Commission which acts as processor in the data processing operation. DG HR's privacy statement on physical access control systems is available under the following link: https://ec.europa.eu/info/sites/default/files/privacy_statement_physical_access_control_system_pacs_en.pdf</p> <p>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).</p> <p>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.</p> <p>Third parties subject to the GDPR³ and third parties not subject to the GDPR</p> <p>None.</p>

³ 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)



7	Time limit storage	The EIT only keeps personal data until the EC badge is valid, but maximum for <i>7 years</i> after the termination of the data subject's employment.
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
10	General description of the technical and organisational security measures	<p>Organisational measures: access to personal data regarding this processing operation is restricted to data recipients indicated above.</p> <p>Technical measures: Electronic data is stored is only accessible to the responsible colleagues of EIT and to the EIT authorised staff mentioned above.</p>
11	For more information, including how to exercise rights to access, rectification, object and data portability (where applicable), see the privacy statement:	<p>Please consult the Data Protection page on the EIT's website:</p> <p>https://eit.europa.eu/who-we-are/legal-framework/data-protection</p>

Signature of the data controller

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

Annex: Privacy statement