



Record¹ of processing activities regarding the EIT Label management

Nr	Item	Description
1	Reference number	DPO-24
2	Name of the data controller, the data protection officer and processor ² , if applicable and contact details	<p>The data controller responsible for the personal data processing operation relating to the EIT Label is the Head of the Innovation Ecosystem Unit.</p> <p>Contact e-mail: EIT-Label@eit.europa.eu</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 the processing is the following:</p> <ul style="list-style-type: none"> - assessment of the KICs' and their partners' programmes and education schemes that applied to receive the EIT Label, and - monitoring of the progress in implementation of the EIT Label programmes and education schemes in line with the process and indicators specified in the relevant EIT Label Handbooks.
4	Categories of data subjects	All the persons (professors, coordinators, learners, or others) involved in the programmes and education schemes which have submitted a new application to be awarded the EIT Label for Degree Programmes (at Master's and Doctoral levels), Fellowship Schemes, Non-Degree Education and EIT Competence Certification

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 (OJ L 295, 21.11.2018, p. 39–98)

² For further information, please see "Categories of data recipients"



		Model; or a performance report and any supporting evidence related to these Programmes; and members of the expert panel(s).
5	Categories of the personal data processed	<p>Within the context of the EIT Label assessment (applications, evaluation and monitoring), the following types of personal data are processed:</p> <ul style="list-style-type: none"> - In relation to the programme and education schemes applications: By EIT: names, contact details, functions, nationality. Regarding the learners: name with narrative feedback, data related to education results, skills competences, innovations and achievements may be processed. By Creative Force: name, contact details, online identifier. As the procedures are managed in the Awards Force tool, the uploaded documents may include further types of personal data. - In relation to expert panel(s): By EIT: name, photo, and short bio, contact details, CVs. By Creative Force: name, contact details, online identifier. <p>Voluntarily, data subjects may disclose more types of personal data directly linked with the EIT Label assessment and monitoring processes.</p>
6	Categories of data recipients	<p>Within the EIT:</p> <p>The personal data of the data subjects are processed by the EIT staff responsible for the EIT Label assessment (Administrators, Assistants, Head of Unit Innovation Ecosystem, EIT Director).</p> <p>Within the Commission and other EU institutions/agencies/bodies:</p> <p>If requested exceptionally, personal data can be disclosed to the responsible unit in Directorate-General Education and Culture (DG EAC) of the European Commission, the partner DG of the EIT.</p> <p>Additionally, data may be disclosed to the European Anti-Fraud Office (OLAF) for investigation purposes.</p>



		<p>In case of an audit or complaint/appeal, the personal data can be disclosed to the auditors in the Commission, and to other EU institutions such as the European Court of Auditors, the European Ombudsman, the European Data Protection Supervisor, the General Court of the European Union, and the European Court of Justice.</p> <p>Third parties subject to the GDPR³ and third parties not subject to the GDPR:</p> <p>Personal data are accessed by the external expert panel(s) who assess quality indicators defined by the EIT Label Framework. The external experts are bound by the data protection and confidentiality rules via their contracts signed with the EIT.</p> <p>The personal data of data subjects will be processed, in connection with the submission of the online applications by the external contractor of the EIT. Creative Force Ltd., established in Malta, is an external service provider (i.e., processor). Their product, Award Force, is used for the submission of applications and for the evaluation by the external experts appointed and contracted by the EIT. Therefore, Creative Force processes personal data related to the applications and to the external experts. Their privacy statement and their cookie policy are available at: https://www.creativeforce.team/privacy-policy/. Personal data are stored in the EU.</p> <p>The limited number of personal data may also be processed, in connection with the promotion of the EIT label programmes and schemes and models, in line with EU and national legislation and their relevant contractual requirements.</p>
7	Time limit storage	<p><u>Personal data of data subjects involved in the applications, in the performance reports and related supporting evidence submitted by the KICs and programme coordinators</u> is retained for a period of ten years from the date of the submission of the files to the EIT.</p> <p>Any further data required for statistical purposes should be kept in an anonymous form.</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)



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)	Please see “6. Categories of data recipients”
9	Legal basis and lawfulness	<p>1) General legal basis:</p> <ul style="list-style-type: none"> • Regulation (EU) 2021/819⁴ of the European Parliament and of the Council of 20 May 2021 on the European Institute of Innovation and Technology (“EIT Regulation”); • Decision (EU) 2021/820⁵ of the European Parliament and of the Council of 20 May 2021 on the Strategic Innovation Agenda of the European Institute of Innovation and Technology (EIT) 2021-2027: Boosting the Innovation Talent and Capacity of Europe and repealing Decision No 1312/2013/EU (“Strategic Innovation Agenda 2021-2027”); • Regulation (EU) 2021/695⁶ of the European Parliament and of the Council of 28 April 2021 establishing Horizon Europe – the Framework Programme for Research and Innovation, laying down its rules for participation and dissemination, and repealing Regulations (EU) No 1290/2013 and (EU) No 1291/2013); • Regulation (EU, Euratom) No 2018/1046⁷ of the European Parliament and of the Council of 18 July 2018 on the financial rules applicable to the general budget of the Union and amending Regulations

⁴ OJ L 189, 28.5.2021, p. 61

⁵ OJ L 189, 28.5.2021, p. 91–118

⁶ OJ L 170, 12.5.2021, p. 1–68

⁷ OJ L 193, 30.7.2018, p. 1–222



		<p>(EU) No 1296/2013, (EU) No 1301/2013, (EU) No 1303/2013, (EU) 1304/2013, (EU) No 1309/2013, (EU) No 1316/2013, (EU) No 223/2014, (EU) No 283/2014, and Decision No 541/2014 and repealing Regulation (EU, Euratom) No 966/2012 (“EU Financial Regulation”).</p> <p>2) Specific EIT legal basis:</p> <ul style="list-style-type: none"> • Decision 11/2021⁸ of the Governing Board of the European Institute of Innovation and Technology (EIT) on the adoption of the new EIT Label Framework; • Decision 26/2021⁹ of the Director of the European Institute of Innovation and Technology (EIT) on the adoption of the new EIT Label Handbook for degree programmes; • Decision 62/2022¹⁰ on the adoption of the EIT Label Handbook for EIT fellowships and the EIT Label Handbook for non-degree education and EIT competence certification model; • Decision 21/2019¹¹ of the Governing Board of the European Institute of Innovation and Technology on the financial regulation of the European Institute of Innovation and Technology; <p>Account transfer agreement concluded by and between the EIT and Creative Force Ltd.</p> <p><u>Lawfulness of the processing operation, the consent of the data subject</u></p> <p>In line with Article 5(1)(a) of Regulation 2018/1725, 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 particular, the provision of the EIT Label assessment contribute to the attainment of the objectives of the EIT as laid down in the EIT Regulation and the Strategic Innovation Agenda 2021-2027 of the EIT.</p>
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⁸ [Ares\(2021\)1930763](#)

⁹ [Ares\(2021\)4092457](#)

¹⁰ [Ares\(2022\)5626894](#)

¹¹ [Ares\(2019\)6810859](#)



		Furthermore, the processing is also lawful based on Article 5(d) of Data Protection Regulation of the European institutions: the data subjects are free to give their data on a voluntary basis and can withdraw their consent any time.
10	General description of the technical and organisational security measures	Access to personal data processed by the EIT is limited to the designated staff of the EIT on a need-to-know basis. Technical measures are in place.
11	For more information, including how to exercise rights to access, rectification, object and data portability (where applicable), see the privacy statement:	Please consult the Data Protection page on the EIT website at the following link: https://eit.europa.eu/who-we-are/legal-framework/data-protection

Signature of the data controller (Approval is given via a workflow in ARES in place of a handwritten signature)

Annex: Privacy statement