



**Record<sup>1</sup> of processing activities regarding  
the selection of new Governing Board members  
of the European Institute of Innovation and Technology**

Nr	Item	Description
1	Reference number	DPO-16
2	Name of the data controller, the data protection officer and processor <sup>2</sup> , if applicable and contact details	<p><b>The data controller</b> responsible for the personal data processing operation relating to the selection of Governing Board members is the EIT Director.</p> <p>Contact e-mail: <a href="mailto:EIT-Applications-GB@eit.europa.eu">EIT-Applications-GB@eit.europa.eu</a></p> <p>Contact e-mail of the Data Protection Officer: <a href="mailto:EIT-DPO@eit.europa.eu">EIT-DPO@eit.europa.eu</a></p>
3	Purposes of the processing	<p>The <b>purpose</b> of the processing of personal data is to manage the selection procedure for the appointment of new members of the EIT Governing Board.</p> <p>An IT tool application form, which requires registration from the candidates, is used for the application process:</p> <ul style="list-style-type: none"> <li>- Before submission: Given that the application materials can be saved and edited before submission, the data processing will already take place at this stage, but the data is not yet forwarded to the EIT responsible staff.</li> </ul>

<sup>1</sup> 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)

<sup>2</sup> For further information, please see “Categories of data recipients”



		<p>- After submission: After submission, the application is saved in the content management system and that content managers (responsible staff of the EIT and of the processor maintaining the IT tool) are able to see the application and export it in Excel and pdf format.</p> <p>Data processing on the conflict of interests declarations of members of the EIT Governing Board and the European Commission Observer are laid down in a separate privacy statement.</p>
4	<b>Categories of data subjects</b>	The data subjects are candidates who apply to the call for expressions of interest and those who register on the IT Tool operated for this purpose.
5	<b>Categories of the personal data processed</b>	<p>Before submitting an application, it is necessary for the candidates to register in the IT Tool with a username and password.</p> <p>Personal data included in the application form and the CVs of the data subjects, including name, contact details, gender, place and date of birth, nationality, phone number, educational and professional background, relations to the Knowledge and Innovation Communities (KICs), personal information related to the motivation of the applicant, short biography and information regarding the exclusion criteria (e.g. including about criminal convictions and/or professional misconduct) are processed. The CV may include a photo of the applicant.</p> <p>Special categories of data (see Article 10 of the Data Protection Regulation of EU Institutions) are not requested from the data subjects. Nevertheless, submitted applications may accidentally include such data. However, the EIT suggests that data subjects should not submit such data.</p>
6	<b>Categories of data recipients</b>	<p><b>Within the EIT</b></p> <p>The information submitted will be</p> <ul style="list-style-type: none"> <li>processed by the EIT website administrator<sup>3</sup>, the EIT Director and a support team within the EIT (e.g. the Head of Director's Office, Legal Officer(s), assistants), led or assigned by the EIT Director;</li> </ul>

<sup>3</sup> The EIT website administrator is able to export all submitted forms to excel and to export all/selected submitted forms individually and/or aggregated in pdf.



		<ul style="list-style-type: none"> <li>• subsequently transferred to and accessed by the members of the Steering Committee (three members of the Governing Board and a European Commission Representative), responsible for the selection procedure; and</li> <li>• the EIT Governing Board, responsible for submitting a proposal for appointment of the new Governing Board members to the European Commission.</li> </ul> <p><b>Within the European Commission and other EU institutions and bodies</b></p> <p>As a member of the Steering Committee, the Representative of the European Commission has access to the personal data of the data subjects. Applications will be processed by the responsible staff of the Commission.</p> <p>Additionally, in case of an audit, complaint or appeal, the personal data may be processed by the Internal Audit Service of the Commission or any external audit service commissioned by the Commission for this purpose, the Court of Auditors, OLAF, the European Ombudsman, the European Data Protection Supervisor, the General Court and the European Court of Justice.</p> <p><b>By third parties subject to the GDPR<sup>4</sup> and third parties not subject to the GDPR</b></p> <p>As much as necessary to ensure IT support for the selection procedure, the personal data is processed by the IT service provider of the EIT (processor). The EIT has concluded a service contract with Unisystems S.M.S.A. for the provision of the IT tool, integrated in the EIT website, which is necessary to submit and receive applications. The service contract lays down provisions on data protection, based on the contract model of the European Commission. Unisystems is a company registered in Greece, its privacy statement is available here: <a href="#">Privacy Policy   Uni Systems</a>.</p> <p>The cookie policy on the EIT website is not applicable to the IT tool, which means that it is not mandatory to consent to the cookie policy to fill out the application form. However, in case the data subject would like to give his/her consent, the cookie policy is available at: <a href="#">Cookies   EIT (europa.eu)</a>.</p>
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<sup>4</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*



		<p>Additionally, information concerning the selection procedure may be disclosed to external lawyers (advocates) for specific and limited purposes only (e.g. litigation). Before disclosing personal data to the external lawyers or other service providers, a written contract shall be signed between the EIT and the contractor(s) in order to ensure that Article 29 of the Regulation 2018/1725 is respected by the data processor.</p> <p>After the EIT publishes the name and the short biography provided for in Section 3 (d) of the application form of the newly appointed members of the EIT Governing Board, these categories of personal data will be accessible to the public.</p>
7	<b>Time limit storage</b>	<p>Personal data processed in the selection procedure will be kept in electronic (and paper form) for a maximum of <b>five years</b> following the date on which the term of office the appointed members of the EIT Governing Board expires or for any other reason ceases, with the exception that the data may be kept for a longer period only as necessary for audit or litigation purposes, and that the data published on the EIT website in line with the provisions of this privacy statement may remain published for a longer period.</p> <p>In case the Commission establishes a list of substitute Governing Board members, their data will be kept for a maximum of <b>five years</b> from the date when the term of office of the EIT Governing Board member expires. In case the substitute member becomes a member of the Governing Board, the retention period for the latter shall apply.</p> <p>Personal data relating to unsuccessful candidates will be kept for a maximum of <b>2 years</b> following the data on which they are informed on the outcome of the selection procedure.</p> <p>The personal data of those who will not submit the application, will be deleted immediately after the expiry of the time limit for appeal.</p>



		<p>If personal data are deleted by the applicant before the submission of the application, the processing of personal data will not continue, except for the personal data used in order to register<sup>5</sup>. If the data subject deletes his/her registration before submission of the application, all personal data shall be deleted.</p> <p>Personal data relating to criminal convictions in the application form shall be deleted at latest within <b>two years</b> from the date of the appointment decision by the European Commission.</p>
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><b>General legal basis:</b></p> <p>Regulation (EU) No 2021/819 of the European Parliament and of the Council of 20 May 2021 on the European Institute of Innovation and Technology (EIT) (recast)<sup>6</sup>, and, in particular, Sections 1-3 of the Statutes of the EIT annexed to the EIT Regulation.</p> <p><b>Specific EIT legal basis:</b></p> <ul style="list-style-type: none"> <li>- Decision 18/2021 of the EIT Governing Board of 11 May 2021 on the Rules of Procedure of the EIT Governing Board and Executive Committee, and, in particular, Article 16<sup>7</sup></li> </ul>

<sup>5</sup> Login name, email.

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

<sup>7</sup> Ref. Ares(2021)3139636



		<ul style="list-style-type: none"> <li>- Decision 25/2023 of the EIT Governing Board of 13 July 2023 on the Code of Conduct of the EIT Governing Board<sup>8</sup></li> <li>- Decisions of the EIT Governing Board on each selection procedure for Governing Board members<sup>9</sup></li> <li>- Service contract No. 04/2023/NP/EITPROC concluded by and between the EIT and Unisystems</li> </ul> <p><b><u>Lawfulness of the processing operation, the consent of the data subject</u></b></p> <p>The lawfulness of processing operations is ensured under Article 5(1)(a) of the Data Protection Regulation of the EU Institutions: 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 Union institution or body.</p> <p>In particular, processing is necessary to enable the functioning of the EIT Governing Board when performing activities that fall under the scope of action of the EIT; this task is carried out in line with the public interest on the basis of the Treaty on the Functioning of the EU and the EIT Regulation.</p> <p>In case data subjects would like to accept the cookie policy, processing operations is ensured under Article 5(1)(d) of the Regulation.</p>
10	<b>General description of the technical and organisational security measures</b>	The applications are submitted via the IT tool specified above (available <a href="#">here</a> ). The tool saves and stores all data on the EIT's server. Access to the server is limited to designated staff of the processor and of the EIT, indicated above. Additionally, it is ensured that pages containing personal data are not indexed by Google, therefore cannot be found by the general public.

<sup>8</sup> Ares(2023)4915633

<sup>9</sup> As available in the 'Library' of the EIT website.



		<p>Information will be stored in a local database on a central server, with individualised access rights. Entitlement to access the information is distributed on a 'need-to-know' basis and access rights are only updated if changes in the EIT support team so require it.</p> <p>The information submitted, if printed on paper, are stored in secure offices within the EIT premises until its destruction.</p>
11	<p><b>For more information, including how to exercise rights to access, rectification, object and data portability (where applicable), see the privacy statement:</b></p>	<p>Please consult the Data Protection page on the EIT website at the following link:</p> <p><a href="https://eit.europa.eu/who-we-are/legal-framework/data-protection">https://eit.europa.eu/who-we-are/legal-framework/data-protection</a></p>

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

Annex: Privacy statement