



PRIVACY STATEMENT REGARDING STAFF ENGAGEMENT SURVEYS ORGANISED BY THE EUROPEAN INSTITUTE OF INNOVATION AND TECHNOLOGY

This privacy statement provides information on the processing of personal data in the context of staff engagement surveys organised by the European Institute of Innovation and Technology (hereinafter referred to as EIT) on the annual basis.

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 all EIT Staff members who were invited to take part in the survey.

Who is the controller of the data processing?

The data controller is the Head of Administration Unit of the EIT.

Who is the processor of data on behalf of the data controller?

The data processor is PricewaterhouseCoopers EU Services EEIG (“PwC”).

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 by PwC (the Processor) is to provide benchmarked staff engagement surveys to the EIT aimed to better tailoring of future policies, improve ongoing initiatives and solve any eventual criticalities emerging from the survey.

The survey will be completed by staff on a voluntary basis.

PwC will provide EIT with three reports related to staff member's current engagement and welfare at EIT: an anonymous, aggregated, comprehensive data analysis report corresponding to all EIT staff; a report by department; and a report by organisational entity (where there are more than five respondents).

The data processing operations include the collection, recording, organisation, storage, consultation, use, disclosure by transmission, erasure and destruction of personal data.

What types of personal data are processed?

List of data categories that EIT will provide to PwC to launch the survey and report on results:

- email addresses (needed to send the survey link to staff), unit and department of all active EIT staff (TA, CA) that have started work at the EIT prior to the launch of the survey and,
- a separate, aggregated, anonymous table with the overall number of active staff by gender (male, female), level (management/non-management), contract type (CA, TA), expat status (yes, no), tenure (less than 1 year, between 1 and 5 years, more than 5 years employed at Eurojust) to enable reporting, i.e. percentage of respondents for a specific organisational entity for example.

List of data categories the data subjects will provide to PwC should they choose to complete the survey:

- gender;
- whether the respondent is managing an organisational entity (yes or no);
- the respondent's type of contract (TA, CA), length of service (under 1 year, between 1 and 5 years, more than 5 years), and expatriate status (yes or no); and,
- personal views on the survey questions collected anonymously.

Who has access to the personal data of data subjects and to whom can they be disclosed?

Within the EIT:

No individual data shared via the survey are accessible to anyone from the EIT.

Breakdown of results will be available only at aggregated level whenever 5 or more responses are given; it will never be possible for any person working at EIT to identify individual responses – including HR and the Senior Management. Furthermore, demographic information will never be cross-analysed (e.g. results for “Contract Agent” within “Unit x”, or “Manager” with “less than 1 year of experience in the agency”, etc.).

A final report which will be available to all EIT staff will not contain any personal data.



Third parties subject to the GDPR² and third parties not subject to the GDPR:

Only a restricted group of PwC staff - those members of the PwC survey team actually managing the survey administration via Qualtrics - will have access to EIT data (email addresses of EIT staff provided by EIT for distributing the survey) and results.

PwC has established documented procedures for secure creation, amendment and deletion of user accounts. Survey answers and results will be anonymous, and it will not be possible for PwC and for EIT to link the answers provided to the email address of each respondent.

Furthermore, responses will be aggregated safeguarding the individuals' anonymity. This means that breakdowns by personal characteristics (i.e. demographic and organizational information such as group, gender, job tenure...) will be shown only when the number of respondents is higher than five (5).

In gathering data and carrying out the survey, PwC will use the aforementioned market-leading surveying tool "Qualtrics", an Application Service Provider (ASP) using a Software-as-a-Service (SaaS) platform, for creating and distributing online surveys.

Qualtrics also adheres to the principles set forth in the most important international standards, such as ISO 27002, and regularly verifies its compliance; also, Qualtrics is fully compliant with Regulation 2016/679.

Furthermore, PwC always sets additional security parameters when operating Qualtrics so to enable access only through individually distributed access links and to prevent internet search engines from indexing distributed links, so as to avoid fortuitous discovery. By using Qualtrics full anonymity of all respondents to the survey is ensured. All Qualtrics accounts for survey administrators are password protected, and all data is replicated in real-time.

How long do we keep your data?

Survey responses will only be retained for as long as it is necessary for PwC to collect and analyse the survey data and prepare the aggregated reports. Once the reports are sent, PwC will delete:

- individual responses (microdata);
- demographic information of staff members; and,
- email addresses.

This is done manually by members of the PwC project team who have been working on this assignment and not later than three months after the reports are sent.

PwC will keep for two years aggregated results of the standard close-ended questions, at the EIT-wide level and for demographic breakdowns (excluding for Department and Unit level) to be able to benchmark with other Agencies if this is requested. All references to EIT are removed from the data stored.

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)



EIT will keep the analysis reports provided by PwC for a maximum 10-year period to ensure benchmarking of results with future surveys.

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”).

The 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 exercised by sending a request in a written form to the EITHR2@eit.europa.eu. 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 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.

You can also contact the PwC team, responsible for managing the survey deployment and maintenance, any working day during which the survey will be active, using the following email address: it_cns_staff.engagement@pwc.com.

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 restrictions³.

Who should be contacted in case of queries or complaints?

If you have any queries concerning the processing of your personal data, you may address them to the following email: EITHR2@eit.europa.eu.

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

³ Currently under adoption. The final version will be published at the following link: <https://eit.europa.eu/who-we-are/legal-framework/data-protection>



- Article 5(1)(b) of Regulation EU 2018/1725: processing is necessary for compliance with a legal obligation to which the controller is subject in compliance with the Framework Contract EEA/ADS/21/014 “Benchmarked staff engagement services” with PwC
- Consent of the data subjects as participation to the survey is entirely voluntary.