

**Record of processing activities regarding prevention and management of the conflict of interests and decision-making processes to avoid conflict of interest of the European Institute of Innovation and Technology staff members**

Nr	Item	Description
1	Reference number	DPO-68
2	Name of the data controller, the data protection officer and processor, if applicable and contact details	<p><b>The data controller</b> is the EIT Director.</p> <p>Contact e-mail: <a href="mailto:EITHR@eit.europa.eu">EITHR@eit.europa.eu</a></p> <p>Contact e-mail of the <b>Data Protection Officer</b>: <a href="mailto:EIT-DPO@eit.europa.eu">EIT-DPO@eit.europa.eu</a></p>
3	Purposes of the processing	Personal data is collected for the purposes of managing the conflict-of-interest situations to ensure the independence and impartiality of the EIT staff
4	Categories of data subjects	<p>The data subjects are:</p> <ol style="list-style-type: none"> <li>1. candidates/applicants for temporary agent, contract agent, seconded national expert and trainee positions at the EIT;</li> <li>2. EIT recruited staff (TA, CA, trainee, seconded national expert);</li> <li>3. close family members of the above persons may be also data subjects, as the EIT staff/applicants for position at EIT are obliged to declare the interest of their family members, if these interests relate to the EIT's activities.<sup>1</sup></li> </ol>

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<sup>1</sup> "Close family member" are considered to be partners (i.e. persons forming parts of the household) or persons dependent on the individual. For privacy reasons neither the relationship nor the name is to be included

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 Data Protection Regulation of the European institutions:</p> <p>The categories of requested data depend on the type of Declarations of Interests submitted by the data subjects in line with Decision 09/2023 of the Governing Board of the EIT on the prevention and management of conflicts of interest and decision-making processes to avoid conflicts of interest of the EIT staff members<sup>2</sup></p> <p><b>1. Declaration of Conflict of Interests for non-managers (pre-recruitment and returning from unpaid leave)</b></p> <ul style="list-style-type: none"> <li>• First name, surname</li> <li>• Financial interests and other sources of conflict of interests (if applicable)</li> <li>• Address for correspondence</li> <li>• Home telephone number</li> <li>• Work telephone number</li> <li>• E-mail address</li> <li>• Applicant number in any European Union competitions/selection procedures (if applicable)</li> <li>• Personal interest, in particular a family or financial interest, or data regarding representation any other interests of third parties that may lead to CoI (if applicable)</li> <li>• Any other element that could be seen as jeopardising independence when working for the EIT (in case of staff returning from unpaid leave)</li> <li>• In case of trainee recruitment: any professional connections with third parties which might be incompatible with the traineeship connected with the work of the EIT (i.e. KICs, lobbyists, etc.)</li> <li>• Position in EIT (In case of staff returning from unpaid leave)</li> </ul>
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<sup>2</sup> Ares(2023)1853331 – 14/03/2023

		<ul style="list-style-type: none"> <li>• Signature</li> </ul> <p><b>2. Declaration of Conflict of Interest for managers (pre-recruitment)</b></p> <ul style="list-style-type: none"> <li>• Current financial interests and other sources of conflict of interests, where applicable</li> <li>• Position in EIT (unit/job)</li> <li>• Data regarding employment and professional interest within the past 5 years (including name of public or private entity, time period, function position/activity, etc)</li> <li>• Data regarding membership of a managing body, or equivalent structure within the past 5 years (including name of public or private entity, time period, function /activity, etc)</li> <li>• Data regarding membership or affiliation within the past 5 years (including name of public or private entity, time period, function /activity, etc)</li> <li>• Data regarding economic interests within the past 5 years (including the name of organisation or commercial entity and time period) - stocks and shares, equity, bonds, partnership interests in the capital of a company, one of its subsidiaries, or a company in which it has a holding</li> <li>• Data regarding intellectual property rights (e.g. patent, trademark or copyright, including name of organization or commercial entity</li> <li>• Data regarding close family members current interests in the field of activity of EIT, including the name of organisation or commercial entity, function/activity, etc</li> <li>• Signature</li> </ul> <p><b>3. Declaration regarding the gainful employment of spouse or partner</b></p> <ul style="list-style-type: none"> <li>• First name, surname</li> <li>• Department/Unit/Job</li> <li>• Data regarding spouse's or partner's gainful employment</li> <li>• Data regarding financial and/or business links between EIT and the organization for which applicant's spouse/ partner works</li> </ul>
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6	Categories of data recipients	<p><b>Within the EIT:</b></p> <ul style="list-style-type: none"> <li>- The personal data of the EIT staff and candidates for positions at EIT may be processed by the responsible EIT staff: HR staff, responsible Head(s) of Unit/Departments, Ethics Officer, and the Director of the EIT<sup>3</sup>.</li> <li>- The personal data may be processed by EIT Legal Section staff on a need-to-know basis, such as in the case of complaints.</li> <li>- Access to the personal data may be given to the Internal Control Coordinator of the EIT by request of the EIT Director if necessary for the performance of the duties of the Internal Control.</li> </ul> <p><b>Within the Commission:</b></p> <ul style="list-style-type: none"> <li>- The access to personal data may be granted to the Internal Audit Service of the Commission, the Legal Service of the Commission, OLAF upon request and only if necessary, in the context of official investigations or for audit purposes.</li> </ul> <p><b>Within other EU institutions and bodies:</b></p> <ul style="list-style-type: none"> <li>- For the purpose of handling review procedures and litigation, access to the personal data may be granted to the European Ombudsman, the European Data Protection Supervisor, the General Court and the European Court of Justice upon request and to the extent necessary for handling the review procedure and litigation.</li> </ul> <p><b>Third parties subject to the GDPR<sup>4</sup> and third parties not subject to the GDPR:</b></p> <ul style="list-style-type: none"> <li>- We commit not to disclose or share any data with third parties, in accordance with the principles outlined in the Data Protection Regulation of the European institutions.</li> </ul>
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<sup>3</sup> For cases involving the processing of data related to the EIT Director's Declaration of Conflict of Interest, personal data is processed by the authorised HR staff, Ethics Officer, CoIAC and Chair of the GB (if applicable)

<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)



		<ul style="list-style-type: none"> <li>- Exceptionally, and if necessary, personal data (e.g. in case of complaints management or court disputes) may be disclosed to law firms. The respective data recipient will handle your personal data in accordance with the instructions of the Data Controller (EIT). The agreement between the parties will include relevant provisions regarding data protection.</li> </ul>
7	Time limit storage	The EIT only keeps your personal data related to management of conflict-of-interest situations of EIT staff (contained in Declarations of Interest) for the time necessary to fulfil the purpose of collection or further processing, namely, for <b>EIT Staff, 5 years</b> after the discharge for the last budgetary year in which they worked for the EIT, and, for the <b>Executive Director, 5 years</b> after the discharge for the budgetary year in which the Executive Director terminate its mandate.
8	If applicable, transfers of personal data to a third country or to international organisation (if yes, the identification of that third country or international organization and the documentation of suitable safeguards)	No
9	General description of the technical and organisational security measures	<p><b>Organisational measures:</b> the personal data of the EIT staff and candidates for positions at EIT is processed by the responsible EIT staff: HR staff, responsible Head(s) of Unit/Departments, Ethics Officer, and the Director of the EIT<sup>5</sup>.</p> <p><b>Technical measures:</b> electronic data is stored in Ares and is only accessible to the staff mentioned in the previous paragraph.</p>
10	For more information, including how to exercise rights to access, rectification, object and data portability (where	<p>Please consult the Data Protection page on the EIT's website:</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>

<sup>5</sup> For cases involving the processing of data related to the EIT Director's Declaration of Conflict of Interest, personal data is processed by the authorised HR staff, Ethics Officer, CoIAC and Chair of the GB (if applicable)

	applicable), see the data protection notice:	
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Signature of the data controller

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

Annex: Privacy statement