

Privacy statement regarding the events and other activities of EIT Alumni

This privacy statement provides information relating to the processing of personal data by the European Institute of Innovation and Technology (EIT) while managing the EIT Alumni events and activities. The processing of personal data of the data subjects follows the provisions of Regulation (EU) 2018/1725 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 data¹ (hereinafter “Regulation 2018/1725”).

What is personal data and what is personal data processing?

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, and 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 is the controller of the data collection?

The data controller is the Head of Strategy and Impact Unit.

¹ OJ L 295 of 21.11.2018, p. 39-98

Who are the data subjects (in particular)²?

Event or activity	Networking	Online challenges and hackathons	Physical hackathons such as the EIT Alumni Startup Days	Online and offline trainings	Online and offline Workshops	Alumni Board meetings (online and offline)	Publications*
Data subject	Participants as attendees and/or speaker, mentor, jury member, moderator, workshop facilitator, etc.	Participants as attendees and/or idea/solution holders or jury members	Participants as attendees and/or idea/solution holders or jury members	Participants as attendees and/or as trainers	Participants as attendee and/or trainers	Members of the Board, participants invited by the Board (e.g. nominees, observers, other participants)	Participants of events and activities

*The EIT may publish reports and other publications related to the Alumni Community in order to fulfill the purposes specified below. Such activity may also include publications in the social media accounts of EIT Alumni.

What is the purpose of the personal data collection?

The processing of the personal data is necessary for the following purposes:

- To register people to the events/activities/meetings mentioned above;
- To ensure the efficient organisation and management of the events/activities/meetings, including the management of participation list, invitations, reporting and follow-up activities;
- To create awareness and promote the visibility of the events and the activities and successes of the EIT Alumni, particularly by means of media and publications.

² Indicative table.

What types of personal data are collected?³

<u>Personal data</u>	<u>Event or activity</u>						
	<u>Networking</u>	<u>Online challenges and hackathons</u>	<u>Physical hackathon such as the EIT Alumni Startup Days</u>	<u>Online (e.g. webinar) and offline training</u>	<u>Online and offline workshop</u>	<u>Alumni Board meetings (online and offline)</u>	<u>Publications</u>
<u>Name</u>	Yes	Yes	Yes	Yes	Yes	Yes	Yes
<u>Email address</u>	Yes	Yes	Yes	Yes	Yes	Yes	Yes
<u>Country of residence</u>	Yes	Yes	Yes	Optional	Optional	Yes	Yes
<u>Membership of a KIC or the EIT Alumni</u>	Yes	Yes	Yes	Yes	Yes	Yes	Yes
<u>IP address</u>	No	Yes	No	Online: Yes Offline: No	Online: Yes: Offline: No	Online: Yes Offline: No	No
<u>Phone number</u>	Optional for the data subject	Optional for the data subject	Optional for the data subject	Optional for the data subject	Optional for the data subject	Optional for the data subject	No
<u>Picture (shared by the data subject)</u>	Optional for the data subject	Optional for the data subject	Optional for the data subject	Online: Optional for the data subject Offline: No	Online: Optional for the data subject Offline: No	Optional for the data subject	Yes
<u>Photo (taken and managed by the EIT)</u>	Optional for the data subject	No	Yes	Trainers: Yes Other data subjects:	Trainers: Yes Other participants:	Yes	Yes

³ Indicative table.

				Optional	Optional		
Audio and Video recording	Optional for the data subject	No	Yes	Trainers: Yes Other data subjects: Optional	Trainers: Yes Other data subjects: Optional	No	Yes
Short Bio	Trainers, etc.: yes; other participants: no	Trainers, etc.: yes; other participants: no	Trainers, etc.: yes; other participants: no	Online+ trainers: yes Offline: no	Yes	Yes	Yes

Futher explanations:

‘Optional for the data subject’ means that during the registration or later, the data subject can freely give his/her explicit consent to process his/her personal data.

In addition to the above, participants at the offline events may be given the opportunity to indicate individual requirements e.g. those pertaining to diet, mobility and attendance at specific EIT Alumni events.

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

Within the EIT:

For the purposes indicated above, access to personal data is provided to the EIT Director, the responsible Head of Unit and EIT staff managing the events and activities (including the follow-up activities).

Access to the personal data may be granted to the Internal Auditor/Head of Internal Audit Capability of the EIT by request if necessary for the performance of the duties of the Internal Auditor.

Within the Commission and other EU institutions/bodies/agencies:

Exceptionally, authorised staff of the following EU institutions may have access to relevant personal data for audit control or investigation purposes: Court of Auditors, Internal Audit Service of the European Commission, Joint Research Centre of the European Commission, European Anti-Fraud Office (OLAF).

For the purpose of handling review procedures and litigation, access to the personal data may be granted also 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.

Third parties subject to the GDPR⁴ and third parties not subject to the GDPR:

Registrations of participants to events and other EIT Alumni activities and the management of the event and other EIT Alumni activities may be made through different tools, platforms and service providers.

For example:

- EWORX S.A. (registration of participants) is an external contractor of the EIT responsible for providing digital services for EIT on the EIT Alumni events and activities. The written framework contract between the EIT and EWORX S.A. contains several provisions on personal data protection, in accordance with the model of the European Commission (DG Budget).
- Eventornado provides the platform/tool for running the online hackathon/challenge together with supporting services. By providing the tool/platform the contractor supports the EIT Alumni in organisation of the online hackathon/challenge. See their privacy statement here: <https://eventornado.com/privacy-policy>.
- Webinars or online trainings can be made via IT platforms, e.g. Microsoft Teams etc. Please refer to their specific privacy statements.
- INOVA+ INOVATION SERVICES S.A., as an external contractor involved in support and development of the EIT Alumni Community has access to personal data, provided by EIT. The written contract between EIT and INOVA+ INOVATION SERVICES SA contains provisions on the protection of personal data.
- CECOFORMA S.A., as an external contractor involved in the organisations of the online and offline events, is collecting the data on behalf of the EIT. The written framework contract between the European Commission's Directorate General for Education and Culture (which is signed on behalf of the EIT as well) and CECOFORMA contains several provisions on the protection of personal data. The collection of photographs, presentations, audio and video recordings will be coordinated by CECOFORMA acting as conference organiser.

⁴ 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)

How long do we keep your data?

Personal data relating to EIT Alumni events and activities: 5 years, with the exception for the rejected applications to participate in the events for which the retention period is 6 months after the event ends.

After the above-mentioned retention periods, the data relating to the event required for scientific or historical research purposes, statistical purposes should be kept in an anonymous form.

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”).

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. This means that data subjects may opt out of the processing of their personal data (e.g. erase their personal data from the participants list or remove their photo from the EIT website).

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 of the data subjects can be exercised from the registration period and until the personal data is retained.

The rights can be only exercised by sending a request in a written form to the EIT-Alumni@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 30 days of receipt of the request. This period may be extended by two further months, where necessary, taking into account the complexity and number of the request(s).

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 restrictions⁵.

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: EIT-Alumni@eit.europa.eu.

⁵ Currently under adoption. The final version will be published at the following link: <https://eit.europa.eu/who-we-are/legal-framework/data-protection>

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

General legal basis

- Regulation (EC) No 294/2008⁶ of 11 March 2008 establishing the European Institute of Innovation and Technology ("EIT Regulation");
- Proposal for a Decision of the European Parliament and of the Council on the Strategic Innovation Agenda of the European Institute of Innovation and Technology (EIT) 2021-2027: Boosting the Innovation Talent and Capacity of Europe)⁷.

Specific EIT legal basis

- Decision 6/2021 of the Governing Board of the EIT on the on the adoption of the Final Single Programming Document (2021-2023) of the EIT⁸;
- Contract No 3/2017/EITPROC, concluded by and between the EIT and Eworx SA;
- Framework contract EAC/27/2015/Lot1 concluded by and between the European Commission⁹ and Cecoforma;
- Contract No 11/2020/OP/EITPROC, concluded by and between the EIT and INOVA+ INOVATION SERVICES SA.

Grounds for lawfulness

In line with Article 5(a) of Regulation No. (EU) 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.

Furthermore, the processing is also lawful based on Article 5(d) of Regulation No. (EU) 2018/1725. Participation in the EIT Alumni event activities and events is voluntary.

⁶ OJ L 97, 9.4.2008, p. 1-12. After the recast EIT Regulation enters into force in the second quarter of 2021, it shall supersede the current Regulation.

⁷ Version of 17 February 2021, as endorsed by the Permanent Representatives Committee (COREPER) at its meeting held on 17 February 2021 (6066/21).

⁸ Ares(2021)1558856.

⁹ On behalf of EIT as well, which implemented this framework contract.