

**Record of processing activities regarding
the internal audit process at the European Institute of Innovation and Technology¹**

Nr	Item	Description
1	Reference number	DPO-10
2	Name of the data controller, the data protection officer and processor, if applicable and contact details	<p>The data controller is the Mr Tamas SAFRANY, Head of Internal Audit Capability (IAC) of the EIT.</p> <p>Contact e-mail: EIT-IAC@eit.europa.eu</p> <p>The Data Protection Officer of EIT is Ms. Nora TOSICS.</p> <p>Contact e-mail: EIT-DPO@eit.europa.eu</p>
3	Purposes of the processing	The processing operations are intended to allow for the identification, analysis, evaluation and recording of the information required to perform audit tests and procedures. These serve as the basis for the observations and recommendations communicated to achieve the overall objectives of the internal audit process.
4	Categories of data subjects	Data subjects can include any individual or group of people whose data is collected and retained by EIT in the context of Internal Audit, including for instance staff members of EIT, members of Governing Board, employees of beneficiaries, employees of tenderers, external experts, etc.

¹ In line with the IAC Charter, the process includes assurance and consulting activities.

5	Categories of the personal data processed	<p>Depending on the nature and the scope of audits, the IAC has full access to personal data processed by the EIT and recorded by any means (on paper, electronically, etc), which is relevant for and serves the purpose of the specific audit exercise. In the course of his duties the IA will process (i.e. handle) such personal information as described above.</p> <p>As a general rule, the information presented in the final audit reports and consultancy reports shall be anonymised.</p>
6	Categories of data recipients	<p>1) EU institutions and bodies:</p> <ul style="list-style-type: none"> - Within the EIT: <p>In most cases, the processed personal data would be stored in audit working papers internal to the Internal Audit Capability, which are not communicated to outside recipients. They may be shared with the auditee and/or the data subject for validation purposes.</p> <p>Audit reports are delivered to the Internal Control Coordinator of the EIT, the Director, the Governing Board, the EIT Audit Committee and to the auditee or auditees (and the person(s) appointed by the auditee as contact point(s), if applicable). In this context the auditee refers to the head of the unit being audited and not necessarily all the individual data subjects. Transmission of this report by the auditee within her or his own service is decided by the auditee.</p> <ul style="list-style-type: none"> - Within the other EU institutions and agencies: <p>Copies are made available to the Internal Audit Service of the European Commission and the European Court of Auditors.</p> <p>2) Third parties subject to the GDPR² and third parties not subject to the GDPR:</p>

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)

		<p>Exceptionally and if necessary, information concerning the internal audit may be disclosed to external lawyers (advocates) subject to the GDPR for specific and limited purposes only. In this case a written contract (service contract) is signed between the EIT and the external lawyer in order to ensure that that Article 29 of the Data Protection Regulation of the EU institutions is respected by the data processor. These written contracts follow the model of the Commission and include a specific article on data protection.</p> <p>The same applies to external IT contractors with whom the EIT has a framework contract in order to provide IT services for the EIT.</p>
7	Time limit storage	<p>The retention period of IAC internal audit reports, consultancy reports and permanent audit files is 10 years (this period runs from the moment when a file has been closed).</p> <p>Other documents, such as audit working papers, would be kept for a maximum of 10 years unless an issue remained unresolved at that point in which case the documentation on that issue would be retained for a longer period.</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)	No
9	For more information, including how to exercise rights to access, rectification, object and data portability (where applicable), see the data protection notice:	<p>Please consult the Data Protection page on the EIT website:</p> <p>https://eit.europa.eu/who-we-are/legal-framework/data-protection</p>

Signature of the data controller

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