



PRIVACY STATEMENT

REGARDING THE MANAGEMENT OF DIPLOMATIC CAR PLATES AT THE EUROPEAN INSTITUTE OF INNOVATION AND TECHNOLOGY

This privacy statement provides information on the processing of personal data of European Institute of Innovation and Technology (EIT) staff carried out by the EIT within the Host Agreement¹ between the EIT and the Government of the Republic of Hungary.

The processing of personal data follows the provisions of Regulation (EU) 2018/1725² 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 as referred in the Host Agreement:

“Article 9

Director and statutory staff

1. (...)

(f) The Director and the statutory staff shall be exempt from paying motor vehicle registration duty provided the motor vehicle is placed into service with a DT or CK (it is only CD now) registration plate and they are not nationals of or permanent residents in Hungary.”

Who is the controller of the data processing?

The data controller is the Head of Services and Finance Unit.

¹ Act CLXVI of 2010 on the promulgation of the Headquarters Agreement between the and the Government of the Republic of Hungary

² OJ L 295, 21.11.2018, p. 39–98



What is the purpose of the personal data processing?

In line with the Host Agreement, the purpose of processing personal data is to provide these personal data for the registration at the Protocol Office of the Ministry of Foreign Affairs (and the government subordinated state-owned company which is involved in the issuing of the diplomatic car number plates).

Issuance of special licence plates is not regulated by the Vienna Convention (1961) and it is generally considered a facility provided by the receiving state for the convenience of the diplomatic corps.

Diplomatic and consular missions as well as bureaus/centres of international organisations based in Hungary and their staff are eligible for special licence plates. Diplomatic missions, international organisations and members of the diplomatic staff and high-ranking officials of international organisations are granted DT series number plates. There is no limit on the number of cars for the official use of the missions and international organisations' bureaus/centres. Members of the diplomatic staff or international organisations' staff with a family may obtain an additional CD licence plate beyond the one issued to the main emissary.

Special licence plates are issued by the licence bureau (Central Administration Office) upon presentation of a countersigned and stamped "gépjárműbejelentő lap" (declaration of status change of a vehicle).

- Application for special registration plates - declaration of status change of a vehicle

The process starts at the Protocol Office where the "gépjárműbejelentő lap" (i.e. declaration of status change of a vehicle) should be presented. This self-copying four-page sheet is available upon request at the Protocol Office.

Diplomatic missions and international organisations are expected to complete this form in the following cases:

- import of a vehicle,
- purchase of a vehicle in Hungary,
- sale of the vehicle or any other change in ownership,
- exporting the vehicle to another country,
- loss of a licence plate.

The application should be duly completed with the data of the vehicle – make, type, engine number, chassis number - and of the owner and former owner or car dealership. Ownership papers with translation, former registration papers, or sales contract/pro forma invoice is expected to be enclosed with the application form that is to be signed by the owner and the head of the mission and duly stamped with the diplomatic missions' or the international organisation's seal.

Motorcycles and other vehicles can also be custom cleared and supplied with special plates in the same process.

- Retaining of the original vehicle document and registration plates

Upon the request of the data subjects the licence bureau allows him/her to retain the original registration document and registration plates of the vehicle. This process is strongly advised in cases when the owner of the vehicle wishes to re-export the vehicle after finishing his/her tour of duty in Hungary.



- Sale of vehicles with special registration plates (CD)

No time limit exists for keeping the vehicles registered with special licence plates, i.e., vehicles with special registration number can be sold, exported or otherwise disposed of at any time.

Special licence plates should be removed from the cars before they are handed over to a non-eligible person. In case of the export of the vehicle special CD plates (temporary) should be exchanged to export licence plates, which are presently a CD series licence plates. These temporary CD licence plates are non-returnable, unlike the ones which must be returned to the licensing office enclosed with a completed “Gépjárműbejelentő lap”. The licensing process is free of charge for diplomatic missions, international organisations and their staff.

Diplomatic missions and international organisations are requested to follow the same process even when the vehicle is transferred to another eligible person including family members. Plates from a driver’s previous vehicle can be transferred to a new vehicle in the same process as the vehicle registration documents should contain the data of the new vehicle.

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?

The following types of personal data are processed for the above-mentioned purposes in accordance with the Regulation:

- Name,
- Mother’s maiden name,
- Place of birth – fill not only the state, or country but the city/town/village as well,
- Address,
- Passport number,
- number of MFA Card.

The personal data are included in the following types of documents:

- “Gépjárműbejelentő lap” (declaration of status change of a vehicle),
- Registration book of the car,
- Ownership proof,
- Document with the technical data of the car (Certificate of conformity) of the data subject if available,
- Purchase order (only in case of newly purchased car either outside or inside Hungary)
- Invoice of the car purchase (only in case of newly purchased car either outside or inside Hungary).

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

Within the EIT:

The personal data of the data subjects is processed by the EIT authorised staff: EIT Logistics team, responsible HR staff, EIT Director and Directorate staff.



Access will be given to the Internal Auditor 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:

The authorized staff that may have access to relevant personal data for audit control or investigation purposes: Court of Auditors, Internal Audit Service of the European Commission, European Anti-Fraud Office (OLAF).

Access to the personal data may be granted also to the European Ombudsman and the European Data Protection Supervisor upon request, the General Court and the European Court of Justice to the extent necessary for handling the review procedure and litigation.

Third parties subject to the GDPR³ and third parties not subject to the GDPR:

Personal data concerning the management of diplomatic car licence plates may be disclosed to the Protocol Office of the Ministry of Foreign Affairs Hungary for specific and limited purposes only, as described above, in line with the Host Agreement.

How long do we keep your data?

The EIT only keeps personal data for the time necessary to fulfil the purpose of collection or further processing, namely for *7 years* as from the approval of the request (and as aligned with the EIT Specific Retention List).

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 only exercised by sending a request in a written form to the EIT-buildingmanagement@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,

³ 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)



the data is restricted immediately for the period of verification of the accuracy of the data, not exceeding on month.

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 restrictions⁴.

Who should be contacted in case of queries or complaints?

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 (EU) 2021/819 of the European Parliament and of the Council on the European Institute of Innovation and Technology⁵, and in particular Articles 1 and 15.1, 15.2 (the latter specifies that the Protocol shall apply to the EIT) thereof,
- The Protocol on the Privileges and Immunities of the European Union⁶, and in particular Article 18 thereof,
- Decision taken by Common Agreement between the Representatives of the Governments of Member States of 18 June 2008⁷ on the location of the seat of the EIT (2008/634/EC) provides that the EIT shall have its seat in Budapest,
- Act CLXVI of 2010, Host Agreement between the EIT and the Government of the Republic of Hungary,
- Article 60 of Government Decree No 326/2011 adopted by the Government of Hungary.

Specific EIT legal basis: NA

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. In line with the Host Agreement the purpose of processing personal data is to provide these data for the registration at the Protocol Office for the issuance of the diplomatic car number plate.

⁴ Currently under adoption. The final version will be published at the following link: <https://eit.europa.eu/who-we-are/legal-framework/data-protection>

⁵ OJ L 189, 28.5.2021, p. 61–90

⁶ OJ C 326, 26.10.2012, p. 266–272

⁷ OJ L 206, 2.8.2008, p. 16–16