Privacy statement regarding the EIT Alumni Connect 2020 event

This privacy statement provides information relating to the processing of personal data by the European Institute of Innovation and Technology (EIT) while managing EIT Alumni CONNECT 2020 virtual event on 28 and 29 November 2020. 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 data (hereinafter “the Regulation”).

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, 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 automated 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?

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

Who are the data subjects (in particular)?

Participants as attendees and speakers, mentors, moderators, workshop facilitators of EIT Alumni Connect 2020 event.

What is the purpose of the personal data processing?

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

- To register participants to the event;
- To ensure the efficient organisation and management of the event, including the management of participation list, networking activities, 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.

What types of personal data are processed?

<table>
<thead>
<tr>
<th>Type of personal data</th>
<th>Category of data subject</th>
<th>Who processes the personal data?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Name</td>
<td>All types of data subjects</td>
<td>EIT, processors</td>
</tr>
<tr>
<td>Nationality</td>
<td>All types of data subjects</td>
<td>EIT, processors</td>
</tr>
<tr>
<td>Contact details (email address, phone number)</td>
<td>All types of data subjects (phone number: optional for the data subject)</td>
<td>EIT, processors (phone number is used only for the second registration part)</td>
</tr>
<tr>
<td>Profession, organisation and position</td>
<td>All types of data subjects</td>
<td>EIT, processors</td>
</tr>
<tr>
<td>Membership of a KIC or the EIT Alumni</td>
<td>All types of data subjects</td>
<td>EIT, processors</td>
</tr>
<tr>
<td>Website and social media profiles for professional purposes (Facebook, Twitter, Linkedin, Instagram profiles)</td>
<td>All types of data subjects (but it is optional for the data subject)</td>
<td>Processors (These data are not collected for the registration, but for the purpose of networking during the event.)</td>
</tr>
<tr>
<td>Picture (shared by the data subject)</td>
<td>All types of data subjects (but it is optional for the data subject)</td>
<td>Processors (These data are not collected for the registration, but for the purpose of networking part of the event.)</td>
</tr>
<tr>
<td>Audio and video recording</td>
<td>Speaker, mentor, moderator, workshop facilitator. It is optional for other participants (in case, the participant takes part in the conversation)</td>
<td>EIT, processors</td>
</tr>
<tr>
<td>Short bio</td>
<td>Speaker, mentor, moderator or workshop facilitator. Optional for other participants.</td>
<td>EIT, processors</td>
</tr>
</tbody>
</table>

Further explanations:
- “Optional” means that during the registration or later, the data subject can freely give his/her explicit consent to process his/her personal data.
- Participation in the networking part of the event via b2match (matchmaking platform) is optional for the participants.

2 The processors are indicated under point “Who has access to the personal data of data subjects and to whom can they be disclosed?”
3 E.g. by asking a question.
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 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, 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 GDPR\(^4\) and third parties not subject to the GDPR:

For the assessment of applications to participate in the EIT Alumni Connect 2020 event, personal data may be shared with the EIT Alumni Board members.

Registration of participants to event 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:
- Webform (registration of participants) is developed by EWORX S.A. acts as an external contractor of the EIT responsible for the maintaining the online registration site. The personal data indicated above are collected, uploaded and stored on its servers based in Europe, consulted, transmitted to the EIT, used and finally erased at the end of the retention period. The written framework contract between the EIT and EWORX contains several provisions on the personal data protection (for more information, please refer to their privacy statement: [https://www.eworx.gr/?i=eworx.en.privacy](https://www.eworx.gr/?i=eworx.en.privacy)).
- b2match (matchmaking platform) for the networking part of the event, please refer to their specific privacy statement ([https://www.b2match.com/privacy-policy](https://www.b2match.com/privacy-policy));

\(^4\) 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)
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 event organiser.

**How long do we keep your data?**

Reports on the event, including a list of participants, will be kept for audit purposes for a period of five years after the EIT budget is discharged in accordance with the EU Financial Regulation and the EIT Financial Regulation.

The other personal data in relation to the event are kept as long as follow-up actions to the event are necessary in view of the purposes of the processing specified above. The relevant data will generally be deleted after one year from the last action in relation to the event.

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.

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 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 restrictions.

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.

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

- Decision 1312/2013/EU of the European Parliament and of the Council of 11 December 2013 on the Strategic Innovation Agenda of the European Institute of Innovation and Technology (EIT): the contribution of the EIT to a more innovative Europe\(^8\).

Specific EIT legal basis

- Decision 27/2019 of the Governing Board of the EIT on the on the adoption of the Final Single Programming Document (2020-2022) of the EIT\(^9\);
- Framework contract No 03/2017/EITPROC concluded by and between the EIT and EWORX S.A.;
- Framework contract No EAC/27/2015 concluded by and between the European Commission’s Directorate General for Education and Culture (which signed it on behalf of the EIT as well) and CECOFORMA S.A.

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.

\(^5\) Currently under adoption. The final version will be published at the following link: https://eit.europa.eu/who-we-are/legal-framework/data-protection
\(^6\) OJ L 97, 9.4.2008, p. 1-12
\(^8\) OJ L 347, 20.12.2013, p. 892-923
\(^9\) Ref. Ares(2020)7911528 - 24/12/2019
Furthermore, the processing is also lawful based on Article 5(d) of Regulation No. (EU) 2018/1725. Participation in the EIT Alumni Connect 2020 is voluntary.