



PRIVACY STATEMENT

REGARDING THE DATA MANAGEMENT CONCERNING PARKING RULES AND REFUND OF PUBLIC TRANSPORTATION COST FOR STAFF MEMBERS OF THE EUROPEAN INSTITUTE OF INNOVATION AND TECHNOLOGY

This privacy statement provides information on the processing of personal data concerning the parking rules and refund of public transportation costs for staff members carried out by the European Institute of Innovation and Technology.

The processing of personal data follows the provisions of Regulation (EU) 2018/1725¹ 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” or “Data Protection 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?

Depending on the processing activity (see below) the data subjects are the following:

1. Procedure for use the EIT parking facilities

Those data subjects who require parking lots:

- a. EIT staff members (statutory staff, seconded national experts);
- b. in exceptional cases for limited period: interims, visitors, and service providers;
- c. members of the Governing Board of the EIT (upon request).

¹ OJ L 295, 21.11.2018, p. 39–98



2. Procedure for reimbursement of public transportation cost:

Statutory staff (temporary agents, contract agents), seconded national experts and trainees having chosen to use public transportation instead of private car to come to the EIT premises.

Who is the controller of the data processing?

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

What is the purpose of the personal data processing?

In line with the EIT's internal policy, the EIT:

- provides parking lots to those data subject who use a private car to come to the EIT premises,
- contributes and provides public transport passes to those data subject, who declare that they do not request parking lots.

It means that there are two separate data processing activities, therefore there are different purposes for processing personal data:

1. Procedure for use the EIT parking facilities: the aim is to provide access to parking to data subjects, who request them.

Request for access:

- a. Staff member/SNE etc. fills in the 'Application for request to access to EIT parking facility' and submits it to EIT-buildingmanagement@eit.europa.eu functional mailbox.
- b. Logistics team registers the request and confirms it to the staff member/SNE by email.

Request for overnight parking:

Staff member/SNE etc. submits the request to EIT-buildingmanagement@eiteuropa.eu by email by completing the 'Request for overnight parking'.

2. Procedure for reimbursement of public transportation cost: to grant the partial reimbursement of public transportation costs to data subjects.

Request for enrolment:

- a. Staff member/SNE/trainee fills in the 'Application for financial support for public transportation' and submits to EIT-buildingmanagement@eiteuropa.eu functional mailbox.
- b. Local Security Officer (LSO) registers the application and submits it to the Finance Section for budget availability check.
- c. The Finance Section registers the enrolment in ABAC and submits the confirmation by email to the requester with LSO in copy.
- d. LSO files the request.



Request for reimbursement:

- a. Data subject fills in the reimbursement form and submits to Finance Section mailbox EIT-Finance@eit.europa.eu
- b. The Finance Section registers the reimbursement request in ABAC and follows the payment workflow.

Responsible EIT staff members approve the request in Speedwell (which is linked to ABAC), and finally the FVA (Financial Verifying Agent) approves it as well, as a final step of this procedure.

What types of personal data are processed?

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

Processing activity	Personal data
1. Procedure for use EIT parking facilities	<ul style="list-style-type: none"> - name - job title - ID card, MFA ID card number - car plate number - registration number (and car model, colour)
2. Procedure for reimbursement of public transportation cost	Name, first name, staff number, and the information included in the justification documents provided by the staff member (transport card number, picture, birth date, address) ² , data related to the bank account of the data subject

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: Head of Services and Finance Unit, Local Security Officer, Logistics Assistant, responsible staff of Directorate and Finance Section, IT 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).

² It must be evident, that the data subject bought it for himself/herself



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.

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@eiteuropa.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, the data is restricted immediately for the period of verification of the accuracy of the data, not exceeding one 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 restrictions³.

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/>.

³ Currently under adoption. The final version will be published at the following link: <https://eit.europa.eu/who-we-are/legal-framework/data-protection>



Legal basis of the processing operation

General legal basis:

- Regulation (EU) 2021/819⁴ of the European Parliament and of the Council of 20 May 2021 on the European Institute of Innovation and Technology (recast), in particular, Section 5(6)(l)
- Annex B of Act CLXVI of 2010 (the “Host Agreement”)

Specific EIT legal basis:

Decision 20/2018 of the Interim Director of the EIT on internal rules governing the use of EIT parking facilities and financial contribution towards public transport.

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.

⁴ OJ L 189, 28.5.2021, p. 61–90