



Record¹ of processing activities in the area of management of grants with the designated Knowledge and Innovation Communities (KICs), including the use of the EIT Grant Management Platform and the use of eGrants

Nr	Item	Description
1	Reference number	DPO-19
2	Name of the data controller, the data protection officer and processor ² , if applicable and contact details	<p>The data controller is the Head of the Innovation Communities Unit of the EIT.</p> <p>Contact e-mail: EIT-KICs@eit.europa.eu;</p> <p>Contact e-mail of the Data Protection Officer: EIT-DPO@eit.europa.eu</p>
3	Purposes of the processing	The purpose of the processing of personal data is to manage the grants awarded by the EIT to the designated Knowledge and Innovation Communities ('KICs'), and in particular to

¹ In line with article 31 of Regulation (EU) 2018/1725 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 (OJ L 295, 21.11.2018, p. 39–98)

² For further information, please see “categories of data recipients”



		<ul style="list-style-type: none"> - launch of the calls for start-up grants and award the start-up grants to the designated KICs in order to allow them to complete the legal and operational setting-up of the KIC in the start-up phase, - sign the Partnership Agreement (PA) with the KICs, which lays down the general terms and conditions under which a KIC operates as an Institutionalised European Partnership, - launch the annual/multiannual EIT invitations to the KICs for the submission of the Business Plans³ and award the annual/multiannual grants to the KICs, and - to award these grants and manage them grants throughout the whole duration of the Grant Agreements (GAs), including the monitoring and reporting processes, and the use of the EIT Grant Management Platform and the use of eGrants⁴. <p>With reference to Article 3(3) of the Data Protection Regulation, the data processing operations include the collection, recording, organisation, storage, consultation, use, disclosure by transmission, erasure and destruction of personal data.</p> <p>In particular, during the grant management processes personal data are received, they may be distributed to external experts and the EIT Governing Board, they are evaluated, stored, implemented, and eventually destroyed. The data, provided by the beneficiaries</p>
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³ As from 2023: Invitation for Business Plans; Invitation for Cross-KIC proposals and Invitation for Higher Education Initiative (HEI) proposal.

⁴ Privacy statements of the Funding and Tenders Portal: <https://ec.europa.eu/info/funding-tenders/opportunities/portal/screen/support/legalnotice>



		<p>which include personal data are used for the preparation, conclusion and implementation of the resulting grant agreements.</p> <p>Note: this record does not cover the personal data processing operations relating to the Calls for KICs (i.e., calls for proposals which result in the selection and designation of new KICs). These processing operations are subject to a separate privacy statement and record⁵.</p>
4	<p>Categories of data subjects</p>	<p>Data subjects are natural persons whose personal data may be included in the applications, in the different agreements (i.e., the Start-up Grant Agreements ('SUGA'), the Partnership Agreements ('PA') and Grant Agreements ('GA') and their amendments) and whose data are processed during or after the lifecycle of the grants.</p> <p>Therefore, the data subjects are the:</p> <ul style="list-style-type: none"> - staff of the start-up grant beneficiaries and other participants (start-up coordinator, consortium members, affiliated entities, subcontractors): e.g., legal representatives, contact persons and other staff members; - staff of the grant beneficiaries and other participants (KIC Legal Entity (LE), KIC partners, affiliated entities, as well as third parties like subcontractors, subgrantees etc.): e.g., legal representatives, contact persons and other staff members; - the subcontractors and subgrantees themselves in case they are natural persons.

⁵ Available here: <https://eit.europa.eu/who-we-are/legal-framework/data-protection>



5	<p>Categories of the personal data processed</p>	<ul style="list-style-type: none"> - Name, - Position/function, grade - Address, telephone, fax, e-mail, - CV (Europass template or free template): the data subject may provide any personal data they deem pertinent, such as contact details, date of birth, education, professional experience including data of previous/current employers, technical and other skills, etc. The photo of data subject is not required, however, it may be included in the CVs, - the Legal Entity form, the Financial Identification form include only the identification data of the legal representative of the beneficiary (for further information please refer to https://ec.europa.eu/info/funding-tenders/procedures-guidelines-tenders/information-contractors-and-beneficiaries/forms-contracts_en). - the Declaration of Honour includes personal data, such as identification data of the legal representative of the beneficiary, and might include personal data relating to any exclusion situation listed in the Declaration of Honour, - the Declaration on Joint and Several Liability of Affiliated Entities includes some identification data of the legal representative of the affiliated entity, - the Accession Form to the Grant Agreement and the document showing link and/or affiliation between partner and its affiliated entity include only the identification data of the legal representative of the beneficiary as well as of the KIC Legal Entity. <p>Special categories of data:</p> <ul style="list-style-type: none"> - Special data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health or sexual orientation may
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		<p>be received only in as much as this data appears spontaneously in the CV provided by the data subjects. This data is not processed during the management of the grant agreements, since it is not pertinent.</p> <ul style="list-style-type: none"> - Before concluding a PA and a GA, the KIC LEs are requested to send documents that prove that the exclusion criteria laid down in the EU Financial Regulation are met by them; these documents include criminal/judicial records, certificates from national tax and social security authorities etc. Since the consortium leader and consortium partners (in the start-up phase) and the KIC LE and KIC partners and affiliated entities are not natural persons, these documents may contain data about the manager (e.g., CEO, Director) of these entities/organisations. Data regarding the entities/organisations are not personal data.
6	Categories of data recipients	<p>EU institutions and bodies:</p> <ul style="list-style-type: none"> - Within the EIT: <ul style="list-style-type: none"> a. Within the responsible unit, data is disclosed to the relevant staff members responsible for the operational tasks (e.g., Head of Unit, Heads of Section, Programme Officers, Grant Assurance Officers, Legal Officers, Project/Policy Support Officers, Assistants and Trainees). b. Outside the responsible Units, data may be disclosed to the relevant staff members of the Services and Finance Unit (Head of Sections, Finance Officer, IT Officer, Assistants), Strategy and Impact Unit (Head of Unit, Heads of Section, Strategy Officers, Impact Officers, Policy Support Officer, Assistant



		<p>and Trainee), Directorate (COO, Internal Control Coordinator, Assistants and Trainees), Communications and Stakeholder Relations Unit (Head of Unit, Heads of Section, Communication Officers, Policy Officers, Assistants and Trainee) the Authorising Officer, the Head of Internal Audit Capability (IAC)</p> <p>c. Personal data may be disclosed to the members EIT Governing Board (EIT GB), if necessary for the decisions to be taken by the EIT GB.</p> <p>- Within the European Commission and other EU institutions and bodies:</p> <p>a. Personal data is managed in the IT tools of the Commission (which acts as joint controller), therefore the data are accessible by Directorate-General Research and Innovation (DG RTD), Directorate-General Budget (DG BUDG, ABAC, PDM, eGrants).</p> <p>b. To the unit in Directorate-General Education and Culture of the Commission (DG EAC, partner DG of the EIT), responsible for the supervision of the EIT.</p> <p>c. For the purpose of safeguarding the financial interests of the European Union: Data may be disclosed to the Internal Audit Services of the Commission (IAS), the Court of Auditors, the European Anti-Fraud Office (OLAF), the Commission's Legal Service upon request and only if necessary, in the context of official investigations or for audit purposes.</p> <p>The Commission's privacy statement for grant management is available at: https://ec.europa.eu/dpo-register/detail/DPR-EC-05067</p>
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⁶ 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)



		<ul style="list-style-type: none"> - if necessary, information concerning the grant agreement implementation may be transferred to external lawyers (advocates), IT contractors established in third countries not subject to GDPR, for specific and limited purposes only. <p>In all these cases a written contract (an expert contract or a service contract) is signed between the EIT and the external expert/external lawyers/IT contractor in order to ensure that Article 29 of the Regulation is respected by the data processor. These written contracts follow the model of the Commission and include a specific article on data protection.</p>
7	Time limit storage	<ul style="list-style-type: none"> - Core documents regarding the award of grants and implementation of grant agreements, and documents regarding the relations with KICs (including Forum documents) are stored for 15 years and shall be then transferred to the Historical Archive of the European Union. - Supporting documents regarding the award of grants and implementation of grant agreements are stored for 7 years and shall be then eliminated. - Criminal/ judicial records are kept for maximum 2 years and then shall be eliminated.
8	If applicable, transfers of personal data to a third country or to international organization (if yes, the identification of that third country or	Please see “ Categories of data recipients ”



	international organization and the documentation of suitable safeguards)	
9	General description of the technical and organisational security measures	Access to personal data is limited to designated staff of the EIT ⁷ and (exceptionally) the processor on a need-to-know basis.
10	For more information, including how to exercise rights to access, rectification, object and data portability (where applicable), see the privacy statement:	https://eit.europa.eu/who-we-are/legal-framework/data-protection

Signature of the data controller (Approval is given via a workflow in ARES in place of a handwritten signature)

Annex: Privacy statement

⁷ And the joint data controller