

**Record¹ of data processing activities on the management of health data
in relation to the COVID-19 pandemic
at the European Institute of Innovation and Technology**

Nr	Item	Description
1	Reference number	DPO-33
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 Services and Finance Unit.</p> <p>Contact e-mail: eithr2@eit.europa.eu</p> <p>Contact e-mail of the Data Protection officer: EIT-DPO@eit.europa.eu</p>
3	Purposes of the processing	<p>This record provides information on the processing of personal data carried out by the European Institute of Innovation and Technology in relation to the COVID-19 pandemic.</p> <p>The purpose of processing personal data is to ensure the health of the data subjects during extraordinary circumstances (COVID-19 pandemic). It is an obligation for the EIT to prevent the spread of COVID-19 amongst data subjects and to ensure working conditions complying with appropriate health and safety conditions. For this purpose, additional information, including health related data, need to be collected and retained, in order to allow for the identification of infected individuals, persons suspected to be contaminated and persons at risk. Furthermore, it is important to vaccinate the data subjects.</p>

¹ In line with Regulation (EU) N 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 Union institutions, bodies, offices and agencies and on the free movement of such data (OJ L 295, 21.11.2018, p. 39-98, hereinafter referred to as "Regulation").

² Details of the processor can be found under "Categories of data recipients".

		<p>To this aim, the EIT takes the following measures:</p> <ol style="list-style-type: none"> 1. Body temperature check to filter access to the EIT premises: Not applicable 2. Contact tracing: data subjects are requested to report to HR and the line manager if they have tested positive, as well as to report the persons they were in close contact with. This is set as practice, which is followed discreetly (without the disclosure of the details of the data subjects and their medical conditions) as to safeguard those that might have been exposed. 3. Checking of occupancy rate: the current instructions to staff³ allow for voluntary presence with a limit to maximum 50% presence in the office. Staff is distributed in shifts which rotate on a weekly basis, staff that wants to visit office outside of its shift time should require permission from the line manager (Head of Unit) with copy to the office Logistics section (building management). External visitors are limited to the necessary minimum for limited duration (required works on premises, mail delivery etc.). 4. COVID-19 diagnostic tests: Upon the occasional request of EIT, its medical service provider ensures the opportunity to have PCR tests available free of charge for the data subjects (including family members). 5. Ensuring COVID-19 vaccination for the data subjects: The host state of the EIT, Hungary provides COVID-19 vaccination to the interested data subjects. The EIT ensures the collection of the personal data of the data subjects to support the vaccination campaign managed by the host state authorities. <p>The data processing operations include the collection, recording, organisation, storage, consultation, use, disclosure by transmission, erasure and destruction of personal data.</p>
--	--	---

³ In this context staff includes staff members and those who are working for the EIT regardless of the type of employment.

		<p>General legal basis:</p> <p>Regulation (EC) No 294/2008 of the European Parliament and of the Council of 11 March 2008 establishing the European Institute of Innovation and Technology , as amended by Regulation (EU) No 1292/2013 of the European Parliament and of the Council of 11 December 2013 ("EIT Regulation")</p> <p>Article 1e of Regulation No 31 (EEC), 11 (EAEC), laying down the Staff Regulations of Officials and the Conditions of Employment of Other Servants of the European Economic Community and the European Atomic Energy Community</p>										
4	Categories of data subjects	<p>The following categories of data subjects can be involved in the personal data processing operations:</p> <ol style="list-style-type: none"> 1. Staff members (exceptionally retired and former staff members), Seconded National Experts (SNEs) and trainees 2. Staff members of contractors who work at the EIT premises (external IT staff, interim agents) 3. Dependents of the staff members and SNEs 										
5	Categories of the personal data processed	<p>The following types of personal data are or might be processed for the above-mentioned purposes in accordance with the Regulation:</p> <table border="1" data-bbox="764 1195 1885 1414"> <thead> <tr> <th>Processing operation</th> <th>Types of personal data</th> </tr> </thead> <tbody> <tr> <td>Body temperature check</td> <td>NA</td> </tr> <tr> <td>Contact tracing</td> <td>Name, contact details, medical information (e.g. symptoms)</td> </tr> <tr> <td>Checking of occupancy rate</td> <td>Name</td> </tr> <tr> <td>Covid-19 diagnostic tests (PCR tests)</td> <td>Name, contact details</td> </tr> </tbody> </table>	Processing operation	Types of personal data	Body temperature check	NA	Contact tracing	Name, contact details, medical information (e.g. symptoms)	Checking of occupancy rate	Name	Covid-19 diagnostic tests (PCR tests)	Name, contact details
Processing operation	Types of personal data											
Body temperature check	NA											
Contact tracing	Name, contact details, medical information (e.g. symptoms)											
Checking of occupancy rate	Name											
Covid-19 diagnostic tests (PCR tests)	Name, contact details											

		Ensuring COVID-19 vaccination for the data subjects	Name, contact details, identification number (ID and/or passport) or social security number
6	Categories of data recipients	<p>Within the EIT:</p> <p>The personal data of the data subjects is processed by the responsible staff of Services and Finance Unit and the responsible staff of the Directorate. Additionally, 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.</p> <p>Within the Commission and other EU institutions/bodies/agencies:</p> <p>For audit control or investigation purposes (only if strictly necessary, and if possible in an anonymised way): Court of Auditors, Internal Audit Service of the European Commission, European Anti-Fraud Office (OLAF).</p> <p>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.</p> <p>Third parties subject to the GDPR⁴ and third parties not subject to the GDPR:</p> <p>Since EIT is not able to carry-out all the above-mentioned measures on its own due to its scope of activities, data are processed to its external service providers. These service providers might process more personal data than the EIT does. For more information, please see their privacy statements:</p>	

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, OJ L 119, 4.5.2016, p. 1–88)

		<ol style="list-style-type: none"> Swiss Medical Egészségügyi Szolgáltató Kft.: https://swissclinic.hu/wp-content/uploads/2020/04/Swiss-Alapellatas-adatkezelesi-tajekoztato-gyogykezeles-ENG.pdf Military Hospital: https://www.honvedkorhaz.hu/images/media/5fdb3a1baf5f3177618812.pdf https://www.honvedkorhaz.hu/images/media/604b48246d590797869406.pdf <p>In certain cases (e.g. contract tracing or COVID-19 vaccination), it is necessary to disclose data to the host country authorities; in these cases only limited and necessary personal data will be transmitted to the local health authority.</p> <ul style="list-style-type: none"> Due to the nature of the COVID-19, the EIT cooperates with the Hungarian Ministry of Foreign Affairs during the vaccination campaign, therefore personal data are shared with them. <p>In the framework of contact tracing: should local health authorities request information from the EIT on staff members who tested positive or are suspected of being infected, the EIT could transfer such data only if it complies with the provisions of Article 9 of the Regulation (provided that the local health authority establishes that the request for transmission of personal data falls within its legal duties to implement a contact tracing operation).</p>
7	Time limit storage	<p>The EIT only keeps your personal data for the time necessary to fulfil the purpose of collection or further processing, namely for 1 year.</p> <p>In case of contact tracing the retention period is 14 days.</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)	NA

9	General description of the technical and organisational security measures	<p>Organisational measures: access to personal data is restricted to recipients specified above.</p> <p>Technical measures: Electronic data is stored on EIT internal SharePoint and is only accessible to the staff mentioned above.</p>
10	For more information, including how to exercise rights to access, rectification, object and data portability (where applicable), see the privacy statement:	<p>Please consult the Data Protection page on the EIT's 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)

Annex: Privacy statement