

**Record of processing activities regarding management of personal files
of the staff of the European Institute of Innovation and Technology**

Nr	Item	Description
1	Reference number	DPO-09
2	Name of the data controller, the data protection officer and processor, if applicable and contact details	<p>The data controller is the Head of Services and Finance Unit.</p> <p>Contact e-mail: HR@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>The purpose of the processing operation is to manage personal files of the EIT staff, to keep them accurate, to ensure their confidentiality and to facilitate access to these files by the data subjects and by authorized persons for human resources management purposes. The processing is required to ensure proper and efficient management of HR matters for the staff working for the EIT.</p> <p>The data processing operations include the collection, recording, organisation, storage, consultation, use, disclosure by transmission, erasure and destruction of personal data.</p>
4	Categories of data subjects	Data subjects include Temporary and Contract staff, Seconded National Experts, trainees and interim staff working for the EIT, and former staff members who have already left the EIT (due to resignation, expiry or termination of contract, retirement).
5	Categories of the personal data processed	<p>The following types of personal data are processed:</p> <p>Personal data related to:</p> <ul style="list-style-type: none"> Recruitment (including the criminal record for Temporary and Contract staff,

		<p>Seconded National Experts);</p> <ul style="list-style-type: none"> • Contractual matters (including transfers); • Job description, objectives, training maps, language certificates; • Evaluation data (e.g. probationary report, appraisal reports); • Administrative career (e.g. documents relating to reclassification); • Entitlements and individual rights; • Social security and pension; • Diplomatic matters; • Termination of service; • Other relevant data (e.g. employment certificates, disciplinary matters, harassment procedures etc.). <p>Special categories data (Article 10 of the Data Protection Regulation of the European institutions)</p> <p>In accordance with Article 26 of the Staff Regulations, the personal file shall contain no references to the staff member’s political, trade union, philosophical or religious activities and views, or to his racial or ethnic origin or sexual orientation.</p> <p>No medical data is inserted in the personal file, except</p> <ul style="list-style-type: none"> - the medical aptitude certificate, which is required during the recruitment phase, - and the medical aptitude certificates of the annual medical check-ups.
6	Categories of data recipients	<p>Within the EIT:</p> <p>The personal data of the candidates is processed by the EIT authorised staff: HR staff, Head of Unit Services and Finance and Director of the EIT.</p> <p>Access will be given to the Internal Auditor of the EIT by request and if necessary for the performance of the duties of the Internal Auditor: depending on the nature and the scope of the specific audit, the Internal Auditor will be given access to personal data which is relevant for and serves the purpose of the specific audit exercise.</p>

		<p>Within the Commission and other EU institutions/bodies/agencies:</p> <p>The authorised 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, the Directorate-General for Human Resources and Security (DG HR), European Anti-Fraud Office (OLAF).</p> <p>For the purpose of providing the recruited EIT staff with the financial entitlements, part of the personal data provided by the data subjects is disclosed to the Payment Master’s Office (internal service of the European Commission responsible for the financial entitlements of staff of the Commission and certain other EU institutions/agencies/bodies).</p> <p>For the purpose of handling review procedures and litigation, access to the personal data may be granted 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.</p> <p>Third parties subject to the GDPR¹ and third parties not subject to the GDPR:</p> <p>Exceptionally and if necessary, information concerning the management of personal files may be disclosed to external lawyers (advocates) subject to the GDPR for specific and limited purposes only. In this case a written contract (service contract) is signed between the EIT and the external lawyer in order to ensure that Article 29 of the Data Protection Regulation of the EU institutions is respected by the data processor. These written contracts follow the model of the Commission and include a specific article on data protection.</p> <p>The same applies to external IT contractors with whom the EIT has a framework contract in order to provide IT services for the EIT.</p>
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¹ 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)

7	Time limit storage	<p>The personal data stored in the personal files will be retained for a <u>period of 10 years as of the termination of employment or as of the last pension payment.</u></p> <p>The criminal record is handed back to the staff member immediately upon recruitment or within <u>maximum 6 months.</u></p>
8	If applicable, transfers of personal data to a third country or to international organisation (if yes, the identification of that third country or international organization and the documentation of suitable safeguards)	No
9	General description of the technical and organisational security measures	<p>Organisational measures: the personal data of the data subjects is processed by the responsible EIT staff mentioned above.</p> <p>Technical measures: hardcopy files are kept in the locked cupboards. Electronic data is stored on EIT network drive and is only accessible to the staff mentioned in the previous paragraph.</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