# Record of processing activities regarding the data management concerning parking rules and refund of public transportation cost for staff members of the European Institute of Innovation and Technology

<table>
<thead>
<tr>
<th>Nr</th>
<th>Item</th>
<th>Description</th>
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</thead>
<tbody>
<tr>
<td>1</td>
<td>Reference number</td>
<td>DPO-39</td>
</tr>
<tr>
<td>2</td>
<td>Name of the data controller, the data protection officer and processor, if applicable and contact details</td>
<td>The data controller is the Head of Services and Finance Unit. (<a href="mailto:eit-buildingmanagement@eit.europa.eu">eit-buildingmanagement@eit.europa.eu</a>). Contact e-mail of the Data Protection Officer: <a href="mailto:EIT-DPO@eit.europa.eu">EIT-DPO@eit.europa.eu</a></td>
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</table>
| 3  | Purposes of the 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.  |

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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

2 For more information, please see below (categories of data recipients).
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@eit.europa.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@eit.europa.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.
4 Categories of 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).

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.

5 Categories of the personal data processed

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

<table>
<thead>
<tr>
<th>Processing activity</th>
<th>Personal data</th>
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| 1. Procedure for use EIT parking facilities              | - 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), data related to the bank account of the data subject |

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3 It must be evident, that the data subject bought it for himself/herself
6. **Categories of data recipients**

**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).

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.

7. **Time limit storage**

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).

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)**

No
| 9 | **General description of the technical and organisational security measures** | **Organisational measures:** access to personal data regarding this processing operation is restricted to data recipients indicated above.  
**Technical measures:** Electronic data is only accessible to the responsible colleagues of EIT. |
|---|---|---|
| 10 | **For more information, including how to exercise rights to access, rectification, object and data portability (where applicable), see the privacy statement:** | Please consult the Data Protection page on the EIT’s website:  

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

Annex: Privacy statement