

PRIVACY STATEMENT FOR EIT LABEL MASTER AND DOCTORAL SCHOOL PROGRAMMES

This privacy statement provides information about the processing and the protection of your personal data.

Processing operation: EIT LABEL MASTER AND DOCTORAL SCHOOL PROGRAMMES

Data Controller: EIT MANUFACTURING AND/OR ITS COLOCATION CENTRES (CLCs)

Table of Contents

1. Introduction
2. Purpose of processing your data
3. Legal basis of processing your data
4. Which personal data do we collect and further process?
5. Data retention periods
6. Safeguard measures
7. Recipients of your data
8. Third party IT tools
9. Your rights and how to exercise them
10. DPO and other contact information

1. Introduction

The **EIT Manufacturing (EIT M)** and/or its CLCs, namely:

Manufacturing SASU,

EIT Manufacturing Central GmbH,

EIT Manufacturing East GmbH,

EIT Manufacturing North AB,

EIT MANUFACTURING SOUTH S.R.L.,

EIT MANUFACTURING West SL,

EIT Manufacturing South-East

are collectively the Data Controller.

The data collector commits to protecting your personal data and respecting your Privacy by collecting and further processing personal data pursuant to 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, GDPR).

This privacy statement explains the reason for the processing of your personal data in the context of actions for the EIT label doctoral and master school programmes by EIT Manufacturing. It explains the way we collect, handle and ensure protection of all personal data provided, how that information is used and what rights you have in relation to your personal data. It also specifies the contact details of the responsible Data Controller with whom you may exercise your rights, the Data Protection Officer and the competent national data protection authorities (DPAs).

2. Purpose of processing your data

The data collector may collect and further process your personal data for the following purposes:

- to organize, implement and put in place all the activities, events and actions regarding the EIT label doctoral and master school programmes,
- to process and facilitate your selection, registration, enrollment and access requirements to the above-mentioned programmes,
- to protect students' health and safety,
- to monitor and evaluate the students' progress,
- To attribute the eventual scholarships,
- For mobility opportunities and management,
- To be used on the alumni portal,
- For the employment purposes,

- for statistical purposes,
- to audit and report to the EIT and European bodies,
- for dissemination of information and the communicational purposes,
- and other legitimate reasons.

3. Legal basis of processing your data

3.1. Consent of the data subject:

At the application phase, by filling and/or submitting the application form, applicants give their consents according to which their personal data can be collected and be processed by the EITM and its CLCs based on Article 6 paragraph 1(a) of the GDPR. The data controllers need to assess the applications in order to offer a place in the framework of the EIT label doctoral and master school programmes.

3.2. Contractual base

When you are enrolled at the program:

When processing personal data is necessary for the performance of a contract to which the data subject is party, Article 6 paragraph 1(b) GDPR is the legal basis for the processing. Indeed, the data controllers need to process your personal data, in order to organize, manage, implement, follow-up and promote the EIT label programmes (including web-streaming, photos, audio-visual recording) based on the contracts you have signed. This also applies to processing operations that are necessary in order to take steps prior to entering into the contract.

Below are the contracts that might concern our students depending on their case:

- Student Agreement for the EIT Manufacturing Master School Programme.
- Scholarship Agreement for the EIT Manufacturing Master School Programme.
- Student Agreement for the EIT Manufacturing Doctoral School Programme.
- Scholarship Agreement for the EIT Manufacturing Doctoral School Programme.

3.3. Compliance with a legal obligation

EITM and its CLCs will collect and process your personal data when it is required for compliance with a legal obligation to which the data controllers are subject and Article 6 paragraph 1(c) GDPR is the legal basis for this processing. These legal obligations are listed as follows:

- Legal obligation laid down by EIT Regulation including the legal obligation of reporting to EIT,

- Legal obligation laid down by Horizon Europe Regulation, including the legal obligation of disseminating and communicating information regarding HE funded activities,
- And other national, European and international binding regulations,

4. Which personal data do we collect and further process?

At the application stage, the following personal data will be collected and processed:

- o Applicants' personal data, such as: name, surname, date of birth, gender, citizenship, country of residence, address, e-mail, phone numbers, previous education, employment, activities, memberships etc.
- o Academic record including details of degree certificates/diplomas
- o PhD position contract and relevant information regarding the position, the university etc.
- o Written statements regarding prerequisites of the programme
- o Academic background and qualifications, thesis etc.
- o letter of supports from PhD supervisors
- o English proficiency certificates
- o Curriculum Vitae including details of academic and professional career
- o letters of motivation
- o National IDs (only for EU/EFTA students) or passports
- o Any disciplinary action taken against you
- o Any link to person, entity, organization sanctioned by EU
- o A digital photograph of applicants
- o Fee information and possible sponsorship
- o Applicants with disability
- o financial situation of applicants

After the students' enrollment, depending on the student agreement and type of scholarship, the following personal data will be collected and processed:

- bank account details of the students
- course notes, credits, study results and all other facts that are necessary to evaluate the student's performance,
- Attending and absence of the student and any personal information justifying the absence,
- medical information of students and insurance-related information,

- Video, audio and photo of the students taken during their participation to the programme activities and events and other recording taken during their study time (for instance video and written interviews, text for success stories, students info included into newsletter, etc.),
- All information about the job mobility, such as contract with the company, letter of engagement, Erasmus+ agreements etc., and the final deliverables of the mobility such as scientific paper, report to the company, prototype etc.
- Any other information pertinent to the organization, implementation or reporting needed for the EIT Manufacturing Doctoral School programme and the obligations that EIT Manufacturing might have in terms of audit, reporting, work implementation and accountability towards EIT and the partners of the programme.
- Enrolment in and results of the attended I&E Programme track and modules.
- Enrolment to and achievement of international mobility.
- Enrolment to and achievement of cross-organizational mobility.
- Responses to surveys and competitions.
- Any special requirements or points of interest student indicate during the registration to events.
- The data controllers may publish the profile of the student in AGORA for thesis, internships/secondment or job opportunities by the EITM partners.

After students' graduation, the following personal data will be collected, processed and shared on the EIT Alumni Portal:

- name, surname, date of birth, citizenship, country of residence, address, e-mail, phone numbers, previous education, employment, activities, memberships.
- Previous education info, including the EITM Master/Doctoral programme (name of institutions, name of programme, type of degrees, graduation date, etc.)
- Role inside the EITM alumni community (such as chair, member) and status (enrolled into alumni, not enrolled withdraw etc.).
- Registration and participation info at alumni meetings, activities and events such as: Name of the meeting/activity/event, dates, locations; Signature sheets or online participation lists; Presentations done, and Any deliverables done during the activity/events.
- Publication of student profile into EITM and EIT alumni database, making searchable for employment opportunities.

5. Data retention periods

The Data Controllers only keeps your personal data for the time necessary to fulfil the purpose of collection or further processing. Once the purpose of the collection is addressed, the data will be archived and removed from the active base.

The Data Controller will retain the personal data of students in its archive for a period up to 10 years and after this period, the personal data will be erased.

6. Safeguard measures

All personal data in electronic format (e-mails, documents, databases, uploaded batches of data, etc.) are stored either on the servers of EIT M or CLCs or on its contractors. All processing operations are carried out pursuant to GDPR.

The EIT M's contractors are bound by specific data protection agreements for any processing obligations deriving from the GDPR.

In order to protect your personal data, the EIT M has put in place a number of technical and organisational measures. Technical measures include appropriate actions to address online security, risk of data loss, alteration of data or unauthorised access, taking into consideration the risk presented by the processing and the nature of the personal data being processed. Safeguarding will include the use of encryption and pseudonymization where appropriate.

Organisational measures include restricting access to the personal data solely to authorised persons with a legitimate need to know for the purposes of this processing operation. Such staff have received training regarding data protection applicable rules.

The data controllers will regularly evaluate and test the effectiveness of those safeguards to ensure security of our processing of personal data.

7. Which personal data will be shared with third parties?

Access to your personal data is provided to EIT M and CLCs staff responsible for carrying out this processing operation and to other EIT M or CLC staff according to the "need to know" principle.

- ✚ The controllers will exchange with the entry/exit university, the personal data mentioned in this statement or signed contract.
- ✚ All personal data collected by the data controllers will be also transferred and stored on the CORDA platform (Copernicus Reference Access Data) in accordance with legal obligation imposed on the data controllers.
- ✚ The data controllers may collect and exchange the personal data of students with NOT-Academic organizations, companies, startups or research centers for the student mobility. the sharing of your information with the programme partners (Universities etc.), the Scientific and Industrial Committee (SIC) responsible for the student's selection, EIT, entities participating in the mobility actions and service providers for the programme;
- ✚ Selected service providers for organisational purposes (such as caterers, travel agents or event management organisations) are contractually bound to process personal data on behalf of and in line with the instructions of the data controller.
- ✚ The data controllers may share the personal data of the students where it is required by applicable regulation with the following organizations: the EIT, the Court of Auditors, OLAF, the European Ombudsman, the European Data Protection Supervisor, the General Court and the European Court of Justice.

8. Third party IT tools

We use third party IT tools to inform about and promote events through widely used communication channels, including the social media via our pages on Youtube, Facebook, Twitter, Instagram and LinkedIn etc.

Our use of third-party IT tools to connect to those services might set cookies when our website pages are loaded on your computer (or other devices). For more information about our cookie policy click [here](#)

These third-party services are provided by different entities not affiliated with EIT M and its CLCs and have their own terms of service and privacy policies. The use of a third-party IT tool does not in any way imply that EIT M endorses them or their privacy policies. In the event that one or more third party IT tools are occasionally unavailable, we accept no responsibility for lack of service due to their downtime.

9. Your rights and how to exercise them

You have specific rights as a 'data subject' under Chapter III (Articles 13-23) of GDPR, in particular the right to access your personal data and to rectify them in case your personal data are inaccurate or incomplete. Where applicable, you have the right to erase your personal data, to restrict the processing of your personal data, to object to the processing, and the right to data portability.

For the cases where you have consented to provide your personal data to the data controller for processing operations, you can withdraw your consent at any time by sending an email to masterschool@eitmanufacturing.eu (for the master programmes) and to doctoralschool@eitmanufacturing.eu (for the PhD programmes). The withdrawal of your consent will not affect the lawfulness of the processing carried out before you have withdrawn the consent.

You can exercise your rights by contacting the data controller, or in case of conflict the Data Protection Officer. Their contact information is given below.

10. Contact information

The Data Controller

If you would like to exercise your rights under GDPR, or if you have comments, questions or concerns, or if you would like to submit a complaint regarding the collection and use of your personal data, please feel free to contact the Data Controller:

masterschool@eitmanufacturing.eu (for the master programmes)
doctoralschool@eitmanufacturing.eu (for the PhD programmes)

The Data Protection Officer (DPO)

You may contact the Data Protection Officer (dpo@eitmanufacturing.eu) with regard to issues related to the processing of your personal data under GDPR.

The Data Protection Authorities

You have the right to have recourse (i.e. you can lodge a complaint) to the competent national data protection authorities (DPAs) (for France this is CNIL) via the following address: <https://www.cnil.fr/fr/plaintes>, if you consider that your rights under GDPR have been infringed as a result of the processing of your personal data by the data controller.