

# Privacy Policy





## PRIVACY POLICY

### Introduction / Legal Ground

EIT Culture & Creativity GmbH is committed to the protection of your personal data and respects your privacy. This privacy policy on the protection of individuals with regard to the processing of personal data is in accordance with the provisions of [Regulation \(EU\) 2018/1725](#) of the European Parliament and of the Council of 23 October 2018.

EIT Culture & Creativity collects and processes personal data, e.g. relating to job applicants, invitations to events or applicants for grants, and is committed to being transparent about how it collects and uses that data. As the EIT Culture & Creativity is 2023 in its startup phase the Privacy Policy will be updated as the services and thus the processing of personal data by the EIT Culture & Creativity is developing and expanding.

### What information does the organisation collect?

1.) The organisation collects a range of personal data. This includes **applicants for jobs**, e.g.

- your name, address and contact details, including email address and telephone number;
- details of your qualifications, skills, experience and employment history;
- information about your current level of remuneration, including benefit entitlements;
- whether or not you have a disability for which the organisation needs to make reasonable adjustments during the recruitment process;
- information about your entitlement to work in the EIT Culture & Creativity and
- once an offer is made, information about your health in what concerns your fitness to work

2.) The organisation collects **personal data when you visit the website** [www.eit-culture-creativity.eu](http://www.eit-culture-creativity.eu). When you visit this website Personal data is any data that can be used to identify you personally.

For detailed information on the subject of data protection privacy statement, including Hosting or Cookies, see the text published here: <https://eit-culture-creativity.eu/privacypolicy/>

3.) The organisation collects personal data from **applicants for grants** through its call for proposals as published here <https://eit-culture-creativity.eu/calls-for-proposals/>.

Applicants who are awarded funding will be beneficiaries of the EIT Culture & Creativity GmbH. They must process personal data under the Agreement in compliance with the applicable EU, international and national law on data protection (in particular, [Regulation \(EU\) 2018/1725](#)).

Beneficiaries must ensure that personal data is:

- processed lawfully, fairly and in a transparent manner in relation to the data subjects
- collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes
- adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed accurate and, where necessary, kept up to date - kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the data is processed and
- processed in a manner that ensures appropriate security of the data



The organisation may collect the above types of information as listed in 1.) to 3.) in a variety of ways. For example, data might be contained in application forms, CVs or resumes, obtained from your passport or other identity documents, or collected through interviews or other forms of assessment, including online tests.

The organisation may also collect personal data about you from third parties, such as references supplied by former employers, information from employment background check providers and information from criminal records checks. The organisation will seek information from third parties only once a job offer to you has been made and will inform you that it is doing so.

Data will be stored in a range of different places, including on your application record, in HR management systems and on other IT systems (including email) and is password protected.

### **Why does the organisation process personal data?**

The organisation needs to process data to take steps at your request prior to entering into contact, a contract or grant with you. It may also need to process your data to enter into a contract or grant with you.

In some cases, the organisation needs to process data to ensure that it is complying with its legal obligations. For example, it is required to check a successful applicant's eligibility to work in the EU before employment starts.

The organisation has a legitimate interest in processing personal data during the recruitment or grant making process and for keeping records of the process. Processing such data allows the organisation to manage the process, assess and confirm a candidate's / applicants suitability. The organisation may also need to process data from job or grant applicants to respond to and defend against legal claims.

The organisation may process special categories of data, such as information about ethnic origin, sexual orientation or religion or belief, to monitor recruitment statistics. It may also collect information about whether or not applicants are disabled to make reasonable adjustments for candidates who have a disability. The organisation processes such information to carry out its obligations.

If your job or grant application is unsuccessful, the organisation may keep your personal data on file in case there are future employment opportunities for which you may be suited. The organisation will ask for your consent before it keeps your data for this purpose and you are free to withdraw your consent at any time.

### **Who has access to data?**

Your information may be shared internally for the purposes of the recruitment exercise. This includes members of the HR and recruitment team, the call for proposals and grant team, interviewers or expert evaluations involved in the process, managers in the business area with a vacancy and IT staff if access to the data is necessary for the performance of their roles.

The organisation will not share your data with third parties, unless your application for employment or grants is successful and it makes you an offer. The organisation will then share your data with former employers to obtain references for you.

The organisation will not transfer your data outside the European Economic Area.

### **How does the organisation protect data?**

The organisation takes the security of your data seriously. It has internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the proper performance of their duties.



## For how long does the organisation keep data?

If your application for employment or grants is unsuccessful, the organisation will hold your data on file for one year after the end of the relevant recruitment process. If you agree to allow the organisation to keep your personal data on file, the organisation will hold your data on file for a further year for consideration for future opportunities. At the end of that period or once you withdraw your consent, your data is deleted or destroyed.

If your application for employment or grant is successful, personal data gathered during the process will be transferred to your personnel file and retained during your employment / grant and project period.

The periods for which your data will be held will be provided to you in a new privacy notice.

## Your rights

As a data subject, you have a number of rights. You can:

- access and obtain a copy of your data on request;
- require the organisation to change incorrect or incomplete data;
- require the organisation to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing; and
- object to the processing of your data where the organisation is relying on its legitimate interests as the legal ground for processing.

If you would like to exercise any of these rights, please send your request to [DPO@eit-culture-creativity.eu](mailto:DPO@eit-culture-creativity.eu).

## What if you do not provide personal data?

You are under no statutory or contractual obligation to provide data to the organisation during the recruitment process. However, if you do not provide the information, the organisation may not be able to process your application properly or at all.

## Contact

EIT Culture & Creativity has appointed a Data Protection Officer according to the [EU Guidelines for Data Protection Officers](#)

Comments or requests regarding this privacy policy are welcomed and should be addressed to our Data Protection Officer by send a mail to [DPO@eit-culture-creativity.eu](mailto:DPO@eit-culture-creativity.eu).

## Changes to Privacy Policy

Any changes we may make to our privacy policy in the future will be posted on our website and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.