



Record ¹ of processing activities regarding Staff Engagement Surveys organised by the European institute of innovation and technology		
Nr	Item	Description
1	Reference number	DPO-49
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 the Administration Unit of the EIT. Contact e-mail: (EITHR2@eit.europa.eu).</p> <p>Contact e-mail of the Data Protection Officer: EIT-DPO@eit.europa.eu</p> <p>The data processor is PricewaterhouseCoopers EU Services EEIG (“PwC”) (it_cns_staff.engagement@pwc.com).</p>
3	Purposes of the processing	<p>The purpose of processing personal data by PwC (the Processor) is to provide benchmarked staff engagement surveys to the EIT aimed to better tailoring of future policies, improve ongoing initiatives and solve any eventual criticalities emerging from the survey.</p> <p>The survey will be completed by staff on a voluntary basis.</p> <p>PwC will provide EIT with three reports related to staff member’s current engagement and welfare at EIT: an anonymous, aggregated, comprehensive data analysis report corresponding to all EIT staff; a report by department; and a report by organisational entity (where there are more than five respondents).</p>

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).



		The data processing operations include the collection, recording, organisation, storage, consultation, use, disclosure by transmission, erasure and destruction of personal data.
4	Categories of data subjects	The data subjects are all EIT Staff members who were invited to take part in the survey.
5	Categories of the personal data processed	<p>List of data categories that EIT will provide to PwC to launch the survey and report on results:</p> <ul style="list-style-type: none"> - email addresses (needed to send the survey link to staff), unit and department of all active EIT staff (TA, CA) that have started work at the EIT prior to the launch of the survey and, - a separate, aggregated, anonymous table with the overall number of active staff by gender (male, female), level (management/non-management), contract type (CA, TA), expat status (yes, no), tenure (less than 1 year, between 1 and 5 years, more than 5 years employed at Eurojust) to enable reporting, i.e. percentage of respondents for a specific organisational entity for example. <p>List of data categories the data subjects will provide to PwC should they choose to complete the survey:</p> <ul style="list-style-type: none"> - gender; - whether the respondent is managing an organisational entity (yes or no); - the respondent's type of contract (TA, CA), length of service (under 1 year, between 1 and 5 years, more than 5 years), and expatriate status (yes or no); and, - personal views on the survey questions collected anonymously.
6	Categories of data recipients	<p>Within the EIT:</p> <p>No individual data shared via the survey are accessible to anyone from the EIT.</p> <p>Breakdown of results will be available only at aggregated level whenever 5 or more responses are given; it will never be possible for any person working at EIT to identify individual responses – including HR and the Senior Management. Furthermore, demographic information will never be cross-analysed (e.g results for “Contract Agent” within “Unit x”, or “Manager” with “less than 1 year of experience in the agency”, etc.).</p>



		<p>A final report which will be available to all EIT staff will not contain any personal data.</p> <p>Third parties subject to the GDPR³ and third parties not subject to the GDPR:</p> <p>Only a restricted group of PwC staff - those members of the PwC survey team actually managing the survey administration via Qualtrics - will have access to EIT data (email addresses of EIT staff provided by EIT for distributing the survey) and results.</p> <p>PwC has established documented procedures for secure creation, amendment and deletion of user accounts. Survey answers and results will be anonymous, and it will not be possible for PwC and for EIT to link the answers provided to the email address of each respondent.</p> <p>Furthermore, responses will be aggregated safeguarding the individuals' anonymity. This means that breakdowns by personal characteristics (i.e. demographic and organizational information such as group, gender, job tenure...) will be shown only when the number of respondents is higher than five (5).</p> <p>In gathering data and carrying out the survey, PwC will use the aforementioned market-leading surveying tool "Qualtrics", an Application Service Provider (ASP) using a Software-as-a-Service (SaaS) platform, for creating and distributing online surveys.</p> <p>Qualtrics also adheres to the principles set forth in the most important international standards, such as ISO 27002, and regularly verifies its compliance; also, Qualtrics is fully compliant with Regulation 2016/679.</p> <p>Furthermore, PwC always sets additional security parameters when operating Qualtrics so to enable access only through individually distributed access links and to prevent internet search engines from indexing distributed links, so as to avoid fortuitous discovery. By using Qualtrics full</p>
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³ 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)



		anonymity of all respondents to the survey is ensured. All Qualtrics accounts for survey administrators are password protected, and all data is replicated in real-time.
7	Time limit storage	<p>Survey responses will only be retained for as long as it is necessary for PwC to collect and analyse the survey data and prepare the aggregated reports. Once the reports are sent, PwC will delete:</p> <ul style="list-style-type: none"> - individual responses (microdata); - demographic information of staff members; and, - email addresses. <p>This is done manually by members of the PwC project team who have been working on this assignment and not later than three months after the reports are sent.</p> <p>PwC will keep for two years aggregated results of the standard close-ended questions, at the EIT-wide level and for demographic breakdowns (excluding for Department and Unit level) to be able to benchmark with other Agencies if this is requested. All references to EIT are removed from the data stored.</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)	No
9	General description of the technical and organisational security measures	PwC has a thorough approach to data management and processing, as well as to IT security: PwC maintains an Information Security Management System (ISMS), that is certified according to ISO/IEC 27001:2005 and is aligned to the control requirements of ISO/IEC 27002:2005. In addition, PwC adheres to the Information Security Policy of the PwC global network of member firms.



		<p>PwC has established documented procedures for secure creation, amendment and deletion of user accounts. Survey answers and results will be anonymous, and it will not be possible for PwC and for EIT to link the answers provided to the email address of each respondent.</p> <p>All PwC staff are required to agree to take reasonable precautions to protect the integrity and confidentiality of security credentials. User accounts are protected by passwords. Periodic password changes, a minimum password length, password complexity and limitations for password reuse are enforced by policy and by technical measures. It is not permitted to share user accounts and passwords. All European Clients served by PwC using Qualtrics have their data stored in a European-based data center. At no time will Qualtrics move that data out of the EU.</p> <p>Qualtrics also adheres to the principles set forth in the most important international standards, such as ISO 27002, and regularly verifies its compliance; also, Qualtrics is fully compliant with Regulation 2016/679.</p> <p>Furthermore, PwC always sets additional security parameters when operating Qualtrics so to enable access only through individually distributed access links and to prevent internet search engines from indexing distributed links, so as to avoid fortuitous discovery. By using Qualtrics full anonymity of all respondents to the survey is ensured. All Qualtrics accounts for survey administrators are password protected, and all data is replicated in real-time.</p>
10	<p>For more information, including how to exercise rights to access, rectification, object and data portability (where applicable), see the privacy statement:</p>	<p>Please see the privacy statement annexed to the record as Annex.</p> <p>Please consult the Data Protection page on the EIT's website: 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)



A body of the European Union



Annex: Privacy statement