

# Privacy Statement

## for European Institute of Innovation and Technology's Deep Tech Talent Initiative (EIT DTTI)

### Table of Contents

1. Introduction: .....	2
2. Purpose of processing your data .....	3
3. Lawfulness and legal basis of processing your data .....	4
4. Which personal data do we collect and further process? .....	5
5. Cookies.....	5
6. Data retention period.....	5
7. Safeguard measures .....	6
8. Who has access to your personal data and to whom is it disclosed? .....	6
9. Third party IT tools .....	8
10. Your rights and how to exercise them.....	8
11. Contact information .....	9

## 1. Introduction:

This privacy statement provides information about the processing and the protection of your personal data in relation to your use of DTTI platform.

Processing operations: EIT Deep Tech Talent Initiative (EIT DTTI) Pledge website (hereafter also 'Platform').

The European Institute of Innovation and Technology's Deep Tech Talent Initiative (EIT DTTI) has the objective of training 1,000,000 Deep Tech innovators and experts in Europe between 2023 and 2025. As part of the [New European Innovation Agenda](#) adopted on 5 July 2022 by the European Commission, the EIT DTTI combines the forces of education and training institutions, companies, research institutes, start-ups, and other stakeholders in realizing this important goal.

The [European Institute of Innovation and Technology](#) (EIT), a body of the European Union ('granting authority') has awarded a grant to its Knowledge and Innovation Communities (KICs) to create and manage the EIT DTTI in the period of 2023-2025. The activities are led by [EIT Manufacturing](#), as coordinator, and the [other EIT KICs](#) are also participating in the initiative and partially managing key aspects of EIT DTTI.

The Controllers commit 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 the EIT DTTI. 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 (DPO) and the competent national data protection authorities (DPAs).

Joint Data Controllers of your personal data are as follows:

- [EIT Manufacturing](#), an association (Registration number W913012329, SIRET 88077857600012, VAT FR62 880778576) registered under French law, with its office at 2, Boulevard Thomas Gobert, 91120 Palaiseau, France, (hereafter 'DATA CONTROLLER' or 'Controller')
- And the following EIT KICs:
  - [EIT Climate-KIC](#): Climate-KIC Holding B.V. Plantage Middenlaan 45, 1018 DC Amsterdam, The Netherlands
  - [EIT Digital](#): EIT Digital IVZW, 7, Rue Guimard, 1040, Brussels, BELGIUM

- [EIT Food](#): EIT Food iVZW Ubicenter A Philipssite 5 bus 34, Belgium
- [EIT Health](#): EIT Health e.V. Mies-van-der-Rohe-Str. 1C, 80807 Munich, Germany
- [EIT InnoEnergy](#): KIC InnoEnergy SE, Kennispoort, 6th Floor, John F. Kennedylaan 2, 5612 AB Eindhoven, The Netherlands
- [EIT Raw Materials](#): EIT RawMaterials GmbH, Europaplatz 2, 10557 Berlin, Germany
- [EIT Urban Mobility](#): EIT KIC Urban Mobility, Torres Glòries, Diagonal 211 Barcelona (08018), Spain

Data subjects are as follows:

- Representatives of Pledgers
- Trained DTTI innovators and experts
- Those who subscribe to the DTTI Newsletter
- Users of the DTTI website including account users for Pledge Members and the DTTI Talent Community
- 

## 2. Purpose of processing your data:

The Data Controllers collect and further process your personal data with the view of accomplishing the following purposes:

- To process the registration of Pledge Members of EIT DTTI and/or to create an account and process registration of users of the EIT DTTI platform in order to give access to the Platform's dedicated space for Members, content and services.
- To allow registration for a DTTI Talent Community account, to create or modify the profile of the account, and to provide personalized recommendation via a courses matching tool and access to other content and services of said account .
- To follow up and implement our cooperation with your organization in the context of the EIT DTTI and the DTTI Pledge you might have submitted.
- In order to keep the communication flow between Pledge Members of EIT DTTI and/or users of the DTTI platform and in general to continue the functionality of the website and improve the experience of the platform's users.
- In order to respond to emails and requests regarding the DTTI.
- To answer queries from website visitors, who are interested in the EIT DTTI.
- For dissemination of information, communication purposes, invitation to and information about the EIT DTTI current and future activities or events and other EIT or KICs relevant activities, events or initiatives.
- For subscription to the DTTI newsletter

- For registering you in our centralised EIT DTTI CRM tool
- For auditing and reporting to European institutions and bodies (including the EIT, European Commission, European Court of Auditors) or national authorities, when required.
- To improve the website performance and content continuously and the services offered by it.
- For statistical purposes.

Your personal data will not be used for any automated decision-making including profiling.

### 3. Lawfulness and legal basis of processing your data:

#### 3.1. Consent of the data subject

If you contact us through the contact form or other sources to express your interest in the DTTI and learn more about it, or if you participate in the DTTI activities (e.g. subscribe for the EIT DTTI Newsletter), you are giving us your explicit consent under Article 6(1)(a) GDPR to process your personal data for the purposes mentioned above.

#### 3.2. Contractual obligations

By creating an account on the EIT DTTI website (Platform) or signing the DTTI Pledge, the data subject accepts the terms of this Privacy Statement, the DTTI Pledge Terms and the Terms & Conditions of the Platform, allowing Data Controllers to collect and process the necessary personal data mentioned herein for the purposes indicated above.

Personal data will be collected and processed in order to implement and execute the DTTI Pledge Terms and the DTTI objectives or the Terms & Conditions of the Platform that Users have accepted. The processing of this personal data is necessary and lawful under Article 6(1)(b) GDPR.

#### 3.3. Compliance with a legal obligation

The Data Controllers will collect and process your personal data when it is required for compliance with a legal obligation to which the Data Controller is subject with respect to the EIT DTTI activities. Article 6 paragraph 1(c) GDPR is the legal basis for this processing. Moreover, the provision of the GDPR will be complemented by:

- Legal obligations laid down by [EIT Regulation](#) (reporting, monitoring, auditing etc.).
- Legal obligations laid down by [Horizon Europe Regulation](#) and obligations also transposed into the [Model Grant Agreement](#) (record keeping, disseminating etc.) which include the DTTI initiative, the Grant Agreement(s) and the Partnership Agreement(s) signed between the KICs and EIT.
- The [EU Financial Regulation](#).

These legal obligations make it necessary that the Controller might use your personal data for auditing, monitoring, record keeping and reporting purposes. In addition, the Controllers need to promote and disseminate information regarding the activities and events of the EIT DTTI initiative in accordance with the New European Innovation Agenda adopted on 5 July 2022 by the European Commission, the

Partnership Agreement signed by the EIT and the specific KICs and the Grant Agreement signed by the EIT and the KICs, which includes the EIT DTTI activities.

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

By creating a Pledger account on the DTTI platform, the following personal data will be collected and processed:

- Contact details (e.g. Name and Surname, e-mail, position, organisation, phone number)

By signing the Pledge, the following additional personal data will be collected and processed:

- First name
- Surname
- Position
- Organisation and type of organisation
- Email
- Country of origin

By subscribing to the EIT DTTI Newsletter, the following personal data will be collected and processed:

- First Name
- Surname
- Email

By creating an EIT DTTI Talent Community account on the Platform, the following data will be collected and processed:

- First Name
- Last Name
- Email
- Nationality
- Country of current residence
- Current status (one of: high school student, college/university student, graduate student, professional, retired, none of the previous)

Optional fields if the DTTI Talent Account:

- DTTI courses taken
- LinkedIn (or other) profile URL
- CV (pdf)
- Deep tech interest

#### 5. Cookies

By visiting our website, several cookies of visitors of the Platform will be collected and processed. For more information, please see our [Cookies Policy](#).

#### 6. Data retention period

The Data Controllers process your personal data for the time necessary to fulfil the purpose indicated in Chapter 2. More specifically:

- Personal data will be processed when and while your account on the DTTI platform is open, and/or you are a member of the DTTI Pledge. Past this period, the Data Controllers will retain the personal data in their archive for a period up to 5 years and after this period, the personal data will be erased or completely anonymized.
- In case of DTTI Newsletter registration, your personal data will be processed for the period of your active subscription. Data subjects may unsubscribe from the DTTI Newsletter anytime, in this case their personal data will be kept in the Data Controller's archive for a period of up to 1 year.

## 7. Safeguard measures

All personal data in electronic format are stored either on the servers of EIT Manufacturing or of its contractors (data processors, see also Chapter 8). All processing operations are carried out pursuant to GDPR. The Controllers' contractors are bound by bilateral agreements setting out contractors' obligations regarding any processing related to personal data.

In order to protect your personal data, Data Controllers have 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.
- Organisational measures include restricting access to personal data solely to authorised persons with a legitimate need to know for the purposes of this processing operation.

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

## 8. Who has access to your personal data and to whom is it disclosed?

Data Controllers:

Access to your personal data is provided to the Data Controllers' staff responsible on the "need to know" basis for carrying their tasks related to your project in connection with the EIT DTTI. Such staff have received training regarding data protection and applicable rules.

European Institutions and bodies:

Access to your personal data may be given to the responsible staff of the granting authority (EIT Director, responsible head of unit, programme officers and assistants, etc.) on the "need to know" basis for carrying their tasks related to your project in connection with the EIT DTTI.

For the purpose of safeguarding the financial interests of the European Union: upon request and only if necessary, in the context of official investigations or for audit purposes your personal data may be

disclosed in particular to the European Court of Auditors, the European Anti-Fraud Office (OLAF), the General Court of the European Union.

Third parties, including processors:

Where necessary, we may also share your information with the following third parties:

- Mailchimp [https://mailchimp.com/](https://mailchimp.com/privacy-policy/) Privacy Policy:  
<https://www.intuit.com/privacy/statement/>
- Pipedrive Pipedrive.com Privacy Notice: <https://www.pipedrive.com/en/privacy>
- In the Cold AB <https://www.inthecold.se/>
  
- Mailjet <https://www.mailjet.com/fr/>
- Digital Ocean <https://www.digitalocean.com/>

- With other selected service providers who are contractually bound to process personal data on behalf of and in line with the instructions of the data controller.
- With EIT Manufacturing's affiliates 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
- With EIT Digital's affiliates namely:
  - CLC in Berlin
  - CLC in Budapest
  - CLC in Eindhoven
  - CLC in Helsinki
  - CLC in London
  - CLC in Madrid
  - CLC in Paris
  - CLC in Stockholm
  - CLC in Trento
- With EIT Food's affiliates namely:
  - EIT Food West
  - EIT Food South
  - EIT Food North-West
  - EIT Food Central
  - EIT Food North-East
- With EIT Health's affiliates namely:
  - EIT Health Austria
  - EIT Health Belgium-Netherlands
  - EIT Health France
  - EIT Health Germany-Switzerland
  - EIT Health Scandinavia
  - EIT Health Spain
  - EIT Health Ireland-UK
  - EIT Health InnoStars
- With EIT InnoEnergy's affiliates namely:
  - EIT InnoEnergy – Umbrella Brand – Trading brand of KIC InnoEnergy SE



- EIT InnoEnergy Benelux
  - EIT InnoEnergy France
  - EIT InnoEnergy Germany
  - EIT InnoEnergy Iberia
  - EIT InnoEnergy Central Europe
  - EIT InnoEnergy Scandinavia
  - EIT InnoEnergy USA
- With EIT Raw Material's affiliates namely:
    - EIT RawMaterials Innovation Hub CLC Baltic Sea
    - EIT RawMaterials CLC Central
    - EIT RawMaterials CLC East Sp. z o. o.
    - EIT RawMaterials North AB
    - EIT RawMaterials CLC South
    - EIT RawMaterials CLC West
  - With EIT Urban Mobility's affiliates namely:
    - Innovation Hub Central
    - Innovation Hub East
    - Innovation Hub North
    - Innovation Hub South
    - Innovation Hub West

## 9. Third party IT tools

We use third party IT tools to inform about and promote the EIT DTTI through widely used communication channels, including common social media. You can watch our videos, which we also upload to our YouTube page and follow links from our website to Facebook, Twitter, Instagram and LinkedIn.

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](#).

We partner with Microsoft Clarity to capture how you use and interact with our website through behavioral metrics, heatmaps, and session replay to improve our services. Website usage data is captured using first and third-party cookies and other tracking technologies to determine the how you are interacting with the Deep Tech Talent Initiative website and services. Additionally, we use this information for site optimization, and fraud/security purposes. For more information about how Microsoft collects and uses your data, visit the Microsoft Privacy Statement <https://learn.microsoft.com/en-us/clarity/setup-and-installation/privacy-disclosure?source=recommendations#:~:text=%22We%20partner%20with,Privacy%20Statement.%22>

These third-party services are provided by different entities not affiliated with Controllers 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 Controllers endorse 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.

## 10. 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

You have agreed to provide your personal data to the Data Controller for the present processing operation. When the processing of your data is based on consent (if applicable), you can withdraw your consent at any time by sending an email to [support@eitdeeptechtalent.eu](mailto:support@eitdeeptechtalent.eu). Please specify 'EIT DTTI consent withdrawal' in the email. 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 Controllers. You may also contact the Data Protection Officer of EIT Manufacturing (or the DPOs of the other Data Controllers). Their contact information is given below.

## 11. Contact information

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 Controllers via the following email addresses:

- For EIT Manufacturing: [dpo@eitmanufacturing.eu](mailto:dpo@eitmanufacturing.eu)
- For EIT Climate-KIC: [privacy.office@climate-kic.org](mailto:privacy.office@climate-kic.org)
- For EIT Digital: [privacy@eitdigital.eu](mailto:privacy@eitdigital.eu)
- For EIT Food: [privacy@eitfood.eu](mailto:privacy@eitfood.eu)
- For EIT Health: [DataPrivacy@eithealth.eu](mailto:DataPrivacy@eithealth.eu)
- For EIT InnoEnergy: [ppc@innoenergy.com](mailto:ppc@innoenergy.com)
- For EIT Raw Material: [info@eitrawmaterials.eu](mailto:info@eitrawmaterials.eu)
- For EIT Urban Mobility: [info@eiturbanmobility.eu](mailto:info@eiturbanmobility.eu)

### *The Data Protection Officer (DPO)*

You may contact the Data Protection Officer of each Joint Data Controller via the following email addresses with regard to issues or complaints related to the processing of your personal data under GDPR:

- DPO of EIT Manufacturing: [dpo@eitmanufacturing.eu](mailto:dpo@eitmanufacturing.eu)
- DPO of EIT Climate-KIC: [ewa.patkiewicz@climate-kic.org](mailto:ewa.patkiewicz@climate-kic.org)
- DPO of EIT Digital: [privacy@eitdigital.eu](mailto:privacy@eitdigital.eu)
- DPO of EIT Food: [privacy@eitfood.eu](mailto:privacy@eitfood.eu) and [Hector.Romero@eitfood.eu](mailto:Hector.Romero@eitfood.eu)
- DPO of EIT Health: [DataPrivacy@eithealth.eu](mailto:DataPrivacy@eithealth.eu)
- DPO of EIT InnoEnergy: [ppc@innoenergy.com](mailto:ppc@innoenergy.com)
- DPO of EIT Raw Material: [info@eitrawmaterials.eu](mailto:info@eitrawmaterials.eu)
- DPO of EIT Urban Mobility: [info@eiturbanmobility.eu](mailto:info@eiturbanmobility.eu)

### *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 (in France [CNIL](https://www.cnil.fr/fr/cnil-direct/question/adresser-une-reclamation-plainte-la-cnil-queelles-conditions-et-comment)) 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. <https://www.cnil.fr/fr/cnil-direct/question/adresser-une-reclamation-plainte-la-cnil-queelles-conditions-et-comment>  
[https://edpb.europa.eu/about-edpb/about-edpb/members\\_en](https://edpb.europa.eu/about-edpb/about-edpb/members_en)

## Version history

Version	Date	Changes
V1	2023	Initial Version
V2	20/02/2024	EIT Manufacturing