



Privacy Statement

**for European Institute of Innovation and Technology's
EIT STEM Tech Talent Induction Platform (eitstemtalent.eu)**

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1. Introduction

This privacy statement provides information about the processing and the protection of your personal data in relation to your use of the EIT STEM Tech Talent Induction platform.

Processing operations: EIT STEM Tech Talent Induction Platform (EIT STEM) Pledge website (hereafter also 'Platform').

The EIT STEM Tech Talent Induction (EIT STEM Talent) works with education, industry, organisations and networks to support access to STEM learning and career pathways by creating, connecting and promoting high-quality opportunities across Europe.

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 STEM Tech Talent Induction platform in the period of 2026-2028. The activities are led by Stichting Climate-KIC International Foundation, as coordinator, and the other EIT KICs are also participating in the initiative and partially managing key aspects of EIT STEM Tech Talent Induction.

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 STEM. 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:

- Stichting Climate-KIC International Foundation, a foundation under Dutch law with its registered office at Plantage Middenlaan 45, 1018 DC Amsterdam, The Netherlands, registration number 77373154 (hereafter '**DATA CONTROLLER**' or '**Controller**');

And the following EIT KICs:

- 28DIGITAL: 28DIGITAL 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 STEM innovators and experts
- Those who subscribe to the STEM Newsletter
- Users of the STEM website including account users for Pledge Members

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 STEM Tech Talent Induction and/or to create an account and process registration of users of the EIT STEM Tech Talent Induction platform in order to give access to the Platform's dedicated space for Members, content and services.
- To follow up and implement our cooperation with your organization in the context of the EIT STEM Tech Talent Induction and the EIT STEM Pledge you might have submitted.
- In order to keep the communication flow between Pledge Members of EIT STEM Tech Talent Induction and/or users of the EIT STEM Tech Talent Induction 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 EIT STEM Tech Talent Induction.
- To answer queries from website visitors, who are interested in the EIT STEM Tech Talent Induction.
- For dissemination of information, communication purposes, invitation to and information about the EIT STEM Tech Talent Induction current and future activities or events and other EIT or KICs relevant activities, events or initiatives.
- For subscription to the EIT STEM Tech Talent Induction newsletter
- For registering you in our centralised EIT STEM Tech Talent Induction 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 EIT STEM Tech Talent Induction and learn more about it, or if you participate in the EIT STEM Tech Talent Induction activities (e.g. subscribe for the EIT STEM Tech Talent Induction 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 STEM Tech Talent Induction website (Platform) or signing the EIT STEM Pledge, the data subject accepts the terms of this Privacy Statement, the EIT STEM 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 EIT STEM Pledge Terms and the EIT STEM 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 STEM Tech Talent Induction 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 EIT STEM Tech Talent Induction initiative, the Grant Agreement(s) and the Partnership Agreement(s) signed between the KICs and EIT; and 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 STEM Tech Talent Induction 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 EIT and the KICs, which includes the EIT STEM Tech Talent Induction activities.

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

By creating a Pledger account on the EIT STEM Tech Talent Induction 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 STEM Tech Talent Induction Newsletter, the following personal data will be collected and processed: First Name; Surname; Email.

Optional fields if the EIT STEM Tech Talent Induction Account: STEM courses taken; LinkedIn (or other) profile URL; CV (pdf); STEM 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 EIT STEM Tech Talent Induction platform is open, and/or you are a member of the EIT STEM 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 EIT STEM Tech Talent Induction Newsletter registration, your personal data will be processed for the period of your active subscription. Data subjects may unsubscribe from the EIT STEM Tech Talent Induction 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 Climate KIC 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 STEM Tech Talent Induction. 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 STEM Tech Talent Induction. 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/>)
- 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 28DIGITAL'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 STEM Tech Talent Induction 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, see our Cookies Policy.

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 info@eitstemtalent.eu. Please specify 'EIT STEM Tech Talent Induction 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 Climate KIC (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 Climate KIC: privacy.office@climate-kic.org
- For 28 Digital: privacy@28digital.eu
- For EIT Food: privacy@eitfood.eu
- For EIT Health: DataPrivacy@eithealth.eu
- For EIT InnoEnergy: ppc@innoenergy.com
- For EIT Raw Material: info@eitrawmaterials.eu
- For EIT Urban Mobility: 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 Climate KIC: privacy.office@climate-kic.org
- DPO of 28 Digital: privacy@28digital.eu
- DPO of EIT Food: privacy@eitfood.eu and Hector.Romero@eitfood.eu
- DPO of EIT Health: DataPrivacy@eithealth.eu
- DPO of EIT InnoEnergy: ppc@innoenergy.com
- DPO of EIT Raw Material: info@eitrawmaterials.eu
- DPO of EIT Urban Mobility: 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 authority 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. As Climate KIC is established in the Netherlands, this is the Dutch Data Protection Authority (**Autoriteit Persoonsgegevens**): <https://www.autoriteitpersoonsgegevens.nl/> and https://edpb.europa.eu/about-edpb/about-edpb/members_en

