

PROTECTION OF YOUR PERSONAL DATA

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

Processing activity: Standard IT operations

Data Controller: Innovative Health Initiative Joint Undertaking

Record reference: DPO - IT - 01

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1 Introduction

The Innovative Health Initiative Joint Undertaking (hereafter 'IHI JU') is committed to protecting your personal data and to respect your privacy. IHI JU collects and processes personal data pursuant to [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 (repealing Regulation (EC) 45/2001) ('Regulation' or 'Regulation (EU) 2018/1725').

This privacy statement explains the reason for the processing of your personal data, 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 Data Protection Officer ('DPO') and the European Data Protection Supervisor ('EDPS').

The information in relation to the processing activity '*Standard IT operations*' undertaken by IHI JU is presented below.

2 Who are the data subjects?

During the standard IT operations, the IHI JU collects personal data of all IHI JU users, including:

- Staff members (contract and temporary agents),
- Interim Staff,
- Trainees,
- Experts,
- Contractors or their representatives,
- Third parties such as the representatives of the project beneficiaries, representatives of the members of IHI JU other than the Union, appointed members of the IHI JU governing board and IHI JU advisory bodies, European Commission representatives and other visitors with access to IHI JU information and ICT systems.

3 Why and how do we collect your personal data?

Purpose of the processing activity: in the context of this privacy statement, IHI JU processes your personal data to:

1. Identity and access management ensuring that the right users have an appropriate access to the IHI JU technology resources. The operation activities could be grouped as follows:
 - Configuration stage including registering (with corresponding access rights), management and deletion of user accounts;
 - Operational stage including:

- ensuring secure access to IT systems by verifying user identity (authentication);
- granting the correct permission via user roles (authorisation).

2. Service Requests: to process, track, and resolve IT incidents and service requests efficiently.
3. Log analysis for investigating cybersecurity incidents, data breaches, or any other potential malicious activities.
4. Assets Inventory: to maintain an accurate record of IT assets, manage IT inventory, and ensure accountability for organisational resources.

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

4 On what legal ground(s) do we process your personal data

IHI JU processes your personal data because the processing activities carried out in the context of this Privacy Statement are necessary and lawful under the following legal basis:

- Regulation (EU) 2018/1725¹ more specifically:
 - Article 5(1) a “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Union institution or body”;
 - Article 5(1) b “processing is necessary for compliance with a legal obligation to which the controller is subject”;
- Council Regulation (EU) 2021/2085 of 19 November 2021 establishing the Joint Undertakings under Horizon Europe and repealing Regulations (EC) No 219/2007, (EU) No 557/2014, (EU) No 558/2014, (EU) No 559/2014, (EU) No 560/2014, (EU) No 561/2014 and (EU) No 642/2014²;
- Commission Decision (EU) 2024/3083 of 4 December 2024 establishing the Code of Good Administrative Behaviour for Staff of the European Commission in their relations with the public³;
- Regulation (EU, Euratom) 2023/2841 of the European Parliament and of the Council of 13 December 2023 laying down measures for a high common level of cybersecurity at the institutions, bodies, offices and agencies of the Union⁴;
- Commission Decision (EU, Euratom) 2017/46 of 10 January 2017 on the security of communication and information systems in the European Commission⁵.

¹ 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. OJ L 295, 21.11.2018, pp. 39–98, <http://data.europa.eu/eli/reg/2018/1725/oj>

² OJ L 427, 30.11.2021, pp. 17–119, <http://data.europa.eu/eli/reg/2021/2085/2023-09-21>

³ OJ L, 2024/3083, 5.12.2024, <http://data.europa.eu/eli/dec/2024/3083/oj>

⁴ OJ L, 2023/2841, 18.12.2023, <http://data.europa.eu/eli/reg/2023/2841/oj>

⁵ OJ L 6, 11.1.2017, pp. 40–51, <http://data.europa.eu/eli/dec/2017/46/2017-01-11>

5 Which personal data do we collect and process?

In order to carry out this processing activity IHI JU collects the following categories of personal data:

- First and Last Name;
- Function;
- IHI JU contact details (e-mail address, corporate telephone number, corporate mobile telephone number, Unit, IP address, etc.);
- Staff number and PerID.

6 How long do we keep your data?

IHI JU only keeps your personal data for the time necessary to fulfil the purpose for which the data is collected and processed, in accordance with the IHI JU specific Retention list⁶ namely for 5 years.

The personal data in IHI JU is archived according to the rules under the [Commission Decision \(EU\) 2021/2121 of 6 July 2020 on records management and archives](#) and Records Management Vademecum update for IHI JU⁷.

7 How do we protect and safeguard your personal data?

All personal data in electronic format (e-mails, documents, databases, uploaded batches of data, etc.) are stored on the IHI JU and European Commission services.

All processing activities (including process of personal data collected on paper) are carried out pursuant to the rules established by the [Commission Decision \(EU\) 2021/2121 of 6 July 2020 on records management and archives](#) and [Commission Decision \(EU, Euratom\) 2017/46 of 10 January 2017 on the security of communication and information systems in the European Commission](#).

The IHI JU's contractors are bound by a specific contractual clause for any processing activities of your data on behalf of IHI JU, and by the confidentiality obligations deriving from the transposition of the General Data Protection Regulation in the EU Member States ('GDPR') Regulation (EU) 2016/679. In case of contractors that are Union institutions, bodies, offices and agencies the processor's obligations are derived from a specific contractual clause and under the Regulation (EU) 2018/1725.

In order to protect your personal data, IHI JU has put a number of technical and organisational measures in place. 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

⁶ [Ares\(2022\)4102727](#), Records Management Vademecum update for IHI JU, Annex 2.

⁷ [Ares\(2022\)4102727](#), Records Management Vademecum update for IHI JU.

of the personal data being processed. 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 activity.

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

Access to your personal data is provided to IHI JU staff responsible for carrying out this processing activity and to authorised staff according to the 'need to know' principle. Such staff abide by statutory, and when required, additional confidentiality agreements.

Access to personal data can also be shared with other recipients other than IHI JU, according to the 'need to know' principle. In particular:

- European Commission services;
- Staff from some European Union Bodies, Institutions and Agencies in the scope of exchange of the electronic address book;
- IT contractors.

The information we collect will not be given to any third party, except to the extent and for the purpose we may be required to do so by law including legal requests from public authorities e.g., from the Internal Audit Service ('IAS'), the European Court of Auditors ('ECA'), European Public Prosecutor's Office ('EPPO'), European Data Protection Supervisor, Anti-Fraud Office ('OLAF'), External auditors, and those other European Union Institutions, Bodies and Agencies ('EUIBAs') as determined by specific need.

9 What are your rights and how can you exercise them?

You have specific rights as a 'data subject' under Chapter III (Articles 14-25) of Regulation (EU) 2018/1725, in particular the right to access, rectify or erase your personal data and the right to restrict the processing of your personal data. Where applicable, you also have the right to object to the processing or the right to data portability.

You have the right to object to the processing of your personal data, which is lawfully carried out pursuant to Article 5(1)(a) on grounds relating to your particular situation.

You can exercise your rights by contacting the IHI JU Data Protection Officer. If necessary, you can also address the European Data Protection Supervisor. Their contact information is given under Heading 10 below.

When you wish to exercise your rights in the context of one or several specific processing activities, please provide their description (i.e. their Register reference(s) as specified under Heading 11 below) in your request.

10 Contact information

The Data Protection Officer of IHI JU

If you would like to exercise your rights under Regulation (EU) 2018/1725, 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 IHI JU Data Protection Officer ('DPO') at data-protection@ihi.europa.eu with regard to issues related to the processing of your personal data under Regulation (EU) 2018/1725.

The European Data Protection Supervisor ('EDPS')

You have the right to recourse (i.e. you can lodge a complaint) to the European Data Protection Supervisor, https://edps.europa.eu/data-protection/our-role-supervisor/complaints_en or edps@edps.europa.eu if you consider that your rights under Regulation (EU) 2018/1725 have been infringed as a result of the processing of your personal data by the IHI JU.

11 Where to find more detailed information?

The IHI JU DPO publishes the Register of all processing activities on personal data in IHI JU, which have been documented and notified to the EDPS. You may access the Register via the following link: <https://www.ihi.europa.eu/legal-notice-and-privacy>

This specific processing activity has been included in the IHI JU DPO's public Register with the following reference: DPO - IT - 01