



EUROPEAN COMMISSION

### **PROTECTION OF YOUR PERSONAL DATA**

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

**Processing operation:** HR: 360° Feedback Survey Mechanism Programme for middle managers in the European Commission

**Data Controller:** DG Human Resources and Security - Management Development & Support Unit

**Record reference:** DPR-EC-00566.3

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## **1. Introduction**

The European Commission (hereafter 'the Commission') is committed to protect your personal data and to respect your privacy. The Commission collects and further 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) No 45/2001).

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 responsible Data Controller with whom you may exercise your rights, the Data Protection Officer and the European Data Protection Supervisor.

The information in relation to processing operation **HR: 360° Feedback Survey Mechanism Programme for middle managers in the European Commission** undertaken by the **Management Development & Support Unit** is presented below.

## **2. Why and how do we process your personal data?**

As part of the Commission's policy on talent management, more specifically with regards to facilitating and supporting middle managers' further professional development, DG HR has developed a 360° Feedback Survey Mechanism Programme. This programme aims at providing middle managers with a rounded view of their leadership capabilities.

To allow participants and respondents to reply to an online survey and to compile the results in one single report, the Commission has to a) identify the potential participants and respondents and b) transmit this information to an external service provider.

**The external service provider** collects, on behalf of the Management Development & Support Unit, the appreciation of a middle manager's leadership capabilities from a number of respondents through an online survey and compiles the results in one single report. The report is the basis for a confidential discussion between the participating middle manager and a human resources expert from the external service provider and acts as a starting point for further professional development.

Participating middle managers are manually identified by the Management Development & Support Unit and the competent Business Correspondent, based on data coming from Sysper.

Respondents are automatically identified on the basis of their assignment as shown in Sysper, except peers from outside the DG, who are proposed by the participating middle manager.

Hierarchical superior(s), direct reports of the participating middle manager, as well as peers within and outside the DG all constitute the group of respondents.

Peers within the DG are identified on the basis of their assignment as shown in Sysper, after which a random selection is made by the external service provider from a shortlist established and communicated by the participating middle managers.

Peers outside the DG are to be proposed by the participating middle manager and chosen randomly by the external service provider.

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

### **3. On what legal ground(s) do we process your personal data**

We process your personal data, because:

(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) a of Regulation 2018/1725).

The processing is based on:

- Article 24a of the Staff Regulations.
- The processing is part of the Commission's policy on talent management, more specifically with regard to facilitating and supporting middle managers' further professional development.
- The initiative for the 360° Feedback Survey Mechanism is mentioned in recital 7 of the Decision on middle management staff C(2016) 3288.

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

In order to carry out this processing operation, the following categories of personal data is collected by:

Unit "Management Development & Support" in DG Human Resources and Security  
Entities "HR Business Correspondent" (HR BC) in the participating DGs

- Name;
- Function and seniority in the function;
- E-mail address.

The above-mentioned data is obtained from Sysper and forwarded to the external service provider.

The external service provider collects the following information:

- Name;
- Function and seniority in the function;
- E-mail address;
- Replies to the questions as set out in the questionnaire sent to participants and respondents.

### **5. How long do we keep your personal data?**

Unit "Management Development & Support" in DG Human Resources and Security only keeps your personal data for the time necessary to fulfil the purpose of collection or further processing, namely as long as participants pursue follow-up actions in relation to the 360° Feedback Survey Mechanism Programme or until the next time the middle manager participates in the 360° Feedback Survey Mechanism Programme, with a maximum of two years.

The feedback report is kept by the external service provider during that period for the case of the participating middle manager requesting access to the report before he/she participates in the exercise again.

## **6. 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 either on the servers of the European Commission or of its contractors. All processing operations are carried out pursuant to the [Commission Decision \(EU, Euratom\) 2017/46](#) of 10 January 2017 on the security of communication and information systems in the European Commission.

The Commission's contractors are bound by a specific contractual clause for any processing operations of your data on behalf of the Commission, 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 order to protect your personal data, the Commission has put in place 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 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 operation.

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

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

Who has access to which parts of the data?

**Unit "Management Development & Support" in DG Human Resources and Security:**

**Entities "HR Business Correspondent" (HR BC) in the participating DGs:**

- Name, seniority in the function, e-mail of participating middle managers;
- Name, function group and e-mail of respondents;
- Anonymised overall aggregate scores at EC or DG level;
- Anonymised overview of competencies.

**Participating middle manager:**

Full report with:

- The anonymous aggregated results per competency cluster, per competency and per respondent group; including a graph with the overall score per competency;
- Average score and the range between the lowest and the highest score;
- Number and percentage of respondents who replied to the questions;
- All answers to the open questions, reproduced verbatim;
- An overview of the competencies which would most benefit from further development and the most highly developed managerial competencies.

**The external service provider, currently PWC (PRICEWATERHOUSECOOPERS EU SERVICES EESV):**

- Name, seniority in the function, e-mail of participating managers;
- Name, function group and e-mail of respondents;
- Replies to the questions as set out in the questionnaire sent to participants and respondents.

Full report with:

- The anonymous aggregated results per competency cluster, per competency and per respondent group; including a graph with the overall score per competency;
- Average score and the range between the lowest and the highest score;
- Number and percentage of respondents who replied to the questions;
- All answers to the open questions, reproduced verbatim;
- An overview of the competencies which would most benefit from further development and the most highly developed managerial competencies.

Please note that pursuant to Article 3(1) of Regulation (EU) 2018/1725 public authorities (e.g. Court of Auditors, EU Court of Justice) which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing.

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.

#### **8. 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).

You can exercise your rights by contacting the Data Controller, or in case of conflict the Data Protection Officer. If necessary, you can also address the European Data Protection Supervisor. Their contact information is given under Heading 9 below.

Where you wish to exercise your rights in the context of one or several specific processing operations, please provide their description (i.e. their Record reference(s) as specified under Heading 10 below) in your request.

#### **9. Contact information**

##### **- The Data Controller**

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 Data Controller,

Unit "Management Development and Support Unit" in DG Human Resources and Security: [hr-mail-C1@ec.europa.eu](mailto:hr-mail-C1@ec.europa.eu)

##### **- The Data Protection Officer (DPO) of the Commission**

You may contact the Data Protection Officer ([DATA-PROTECTION-OFFICER@ec.europa.eu](mailto:DATA-PROTECTION-OFFICER@ec.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 have recourse (i.e. you can lodge a complaint) to the European Data Protection Supervisor [edps@edps.europa.eu](mailto: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 Data Controller.

**10. Where to find more detailed information?**

The Commission Data Protection Officer (DPO) publishes the register of all processing operations on personal data by the Commission, which have been documented and notified to him. You may access the register via the following link: <http://ec.europa.eu/dpo-register>.

This specific processing operation has been included in the DPO's public register with the following Record reference: DPR-EC-00566.3