

PRIVACY STATEMENT

360 degree feedback survey

1. 360 DEGREE FEEDBACK SURVEY

The 360 degree feedback constitutes a Human Resources tool allowing managers to receive feedback from various sources (staff, peers, superiors) concerning their strengths and weaknesses in a wide range of competency areas, on the basis of a survey sent and completed by themselves, as well as by a statistically representative sample of respondents (staff, peers, superiors).

Participation in this exercise for both the manager and the respondents is voluntary and no consequences derive from either participating or not participating.

The legal basis for data processing in the framework of the 360 degree feedback is established in the policy paper on the 360 degree feedback scheme.

The processing of personal data is done in compliance with the provisions of **Regulation (EC) 45/2001, of the European Parliament and of the Council of 18 December 2000 on the protection of individuals with regard to the processing of personal data by the Community institutions and bodies and on the free movement of such data.**

All data collected are necessary and/or relevant to ensure the objectives of the aforementioned procedure.

The processing of the data is done under the responsibility of the Head of Unit A3, Directorate A of the Committee of the Regions (controller). Acting under instructions of the Controller a Feedback Coordinator bound by the statutory obligation of confidentiality, has been designated specifically within the Directorate to process the data (delegated controller).

2. PURPOSE OF THE PROCESSING

The 360 degree feedback allows the manager concerned to learn the views of people working closely with him on his skills and performance in terms of people management and leadership on the one hand and in a number of other operational management responsibilities (task, process, quality and information management) on the other.

The 360 degree feedback constitutes a professional development tool, formally distinct and disconnected from the appraisal procedure. It follows that this tool aims to help the managers concerned (jobholders) learn about their professional and managerial skills and enhance their own personal development in a professional context.

In order to improve the institution's organisational efficiency and well-being, the 360 degree feedback scheme aims primarily at constantly improving managerial skills and behaviour of the individual managers within the institution. It focuses therefore on a broad set of management related competencies which are fundamental to establish an appropriate performance climate for an organisation or team.

3. NATURE OF THE PERSONAL DATA COLLECTED AND PURPOSE OF THE COLLECTION

The following data will be collected from the participants: full name; position; e-mail address; group of respondents they belong to (staff, peers, superiors); Unit and Directorate; replies to the survey in the form of scores given to the different statements and/or open comments or suggestions.

4. WHO HAS ACCESS TO YOUR INFORMATION AND TO WHOM IS IT DISCLOSED?

The access to all personal data as well as all information collected in the context of the 360 degree feedback survey is only granted through UserId/Password to a defined population of users. These users are:

- 1) The person specifically designated within Directorate A to organise the 360 degree feedback bound by the statutory obligation of confidentiality (Feedback Coordinator).
- 2) An external consultant (Evaluator) in charge of analysing the data and preparing the analytical report for the manager concerned an which will receive only the raw data stemming from the 360 degree feedback with no reference to the identity of the respondents (except for their category).

No personal data are transmitted to parties which are outside the recipients and the legal framework mentioned.

5. HOW DO WE PROTECT AND SAFEGUARD YOUR DATA?

All files are saved and protected with a UserID and personal password and accessible only to the Feedback Coordinator.

6. HOW CAN YOU VERIFY, BLOCK, MODIFY OR DELETE YOUR DATA?

In case you want to verify which personal data are processed on your behalf by the Feedback Coordinator or the Evaluator, have it blocked, modified, corrected or deleted, please contact the Feedback Coordinator or the controller by using the contact information below and by explicitly specifying your request.

7. FOR HOW LONG DO WE KEEP YOUR DATA?

The individual contributions will be kept for a period of six months after the exercise is completed and when the results of the 360 degree feedback have been completely analysed and the feedback report produced.

A copy of the feedback report will be kept in a sealed envelope until the next 360 degree feedback exercise regarding the same jobholder is completed In any event the period of retention of this copy will not exceed ten years.

8. WHOM TO CONTACT IF YOU HAVE QUERIES OR COMPLAINTS?

In case you wish to verify which personal data are stored on your behalf by the responsible controller, have it blocked, modified, corrected, or deleted, or if you have questions regarding the 360 degree feedback, or concerning any information processed in the context of this exercise, or on your rights, please contact the Feedback Coordinator. The Feedback Coordinator acts as delegated controller under the responsibility of the Data Controller within Directorate A (which is the Head of Unit of Unit A.3).

For further questions, you can contact the Data Protection Officer in the CoR (e-mail: data.ptprotection@cor.europa.eu).

As regards the processing of your personal data, you have a right to recourse at any time to the European Data Protection Supervisor (<http://www.edps.europa.eu>).