

## EDPS record of processing activity

Record of EDPS activities processing personal data, based on Article 31 of 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.

Nr.	Item	Description
		<b>IMPACT 360 LEADERSHIP ASSESSMENT AND FEEDBACK COACHING</b>
1.	Last update of this record	<b>03.02.2022</b>
2.	Reference number	<b>46</b>
3.	Name and contact details of controller	<a href="#">European Data Protection Supervisor (EDPS)</a> <b>Postal address:</b> Rue Wiertz 60, B-1047 Brussels <b>Office address:</b> Rue Montoyer 30, B-1000 Brussels <b>Telephone:</b> +32 2 283 19 00 <b>Email:</b> <a href="mailto:edps@edps.europa.eu">edps@edps.europa.eu</a>  Responsible department or role: EDPS HRBA - <a href="mailto:EDPS-Training@edps.europa.eu">EDPS-Training@edps.europa.eu</a>  Contact form for enquiries on processing of personal data to be preferably used: <a href="https://edps.europa.eu/node/759">https://edps.europa.eu/node/759</a>
4.	Name and contact details of DPO	<a href="mailto:DPO@edps.europa.eu">DPO@edps.europa.eu</a>
5.	Name and contact details of joint controller (where applicable)	N/A



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6.	Name and contact details of processor (where applicable)	<p><b>Processor:</b></p> <p>The GreenHouse Group bvba 54-56 rue de la Montagne, B-1000 Brussels</p> <p><b>Subprocessor:</b></p> <p>Performance Consultants International Ltd 93 Ifield Road, London SW10 9AS</p>
7.	Short description and purpose of the processing	<p>The purpose of the processing is to allow reviewees (EDPS Managers) in a developmental perspective, to obtain feedback on their management and leadership skills and help them develop their competencies.</p> <p>The processing of data is as follows:</p> <ol style="list-style-type: none"> <li>All the parties (reviewees and reviewers) are given full information about the feedback exercise and are invited to participate. If they agree, they must provide their details (name and electronic address) to the HRBA unit. These details are provided to sub-processor. Any change regarding the company providing this service (including sub-contracting) will result in an update to the record and the data protection notice. This data serves purely to identify the reviewee and those colleagues giving feedback (reviewers) and to allow the contractor to contact them. They are provided at this stage with full information about the exercise and the nature and steps of data processing. They are also provided with a data protection notice giving data protection information. There is no obligation for the reviewee to share the individual report with anyone. As part of the programme, he or she will receive a de-briefing by a coach from the sub-processor, who bound by a confidentiality clause.</li> </ol>



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		<p>2. The reviewee provides input by completing an on-line questionnaire about their competencies. The data collected take the form of responses to open questions, i.e. answering with textual data, and numerical ratings.</p> <p>3. The reviewers provide their input by completing an on-line questionnaire about the competencies of the reviewee. The data collected take the same form of responses to open questions like the ones raised to the reviewee, i.e. answering in textual form, and numerical ratings. A disclaimer will explicitly make the reviewers aware of the data protection risk linked to the possibility of recognising their writing style – and will invite them to take the necessary precautions. The reviewee will not receive information revealing the identity of the persons who reviewed his or her skills.</p> <p>4. The sub-processor processes the data supplied by the reviewees and the reviewers. The data from the two sources will be consolidated. An automatic individual report will be generated that identifies the reviewee's strengths and areas for development. The individual report containing the 360° leadership feedback will be accessible only to the reviewee, the coach for the individual feedback session (debriefing) and the Evaluator.</p> <p>5. In the case where a group report is generated and provided to the HRBA unit and Senior Management of the EDPS, they will have access only to aggregated information about the compiled group results (such as most voted and less voted competencies, number of participants), without any possibility to track or identify individual responses (only the total number of reviewers will be indicated).</p>



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		6. The HRBA representatives can meet each reviewee (Head of Unit and Head of sector) to discuss the personal development needs stemming from the feedback results and identify appropriate follow-up activities (including coaching, training or other) if needed.
8.	Description of categories of persons whose data the EDPS processes and list of data categories	<p>Categories of data subjects: managers (<b>reviewees</b>)</p> <p>The identity of the <b>reviewers</b> is not disclosed and their feedback is anonymous.</p> <p>The following categories of personal data will be processed:</p> <ul style="list-style-type: none"> <li>• Data allowing the identification of the data subject: name, first name, electronic address, gender, country(ies) of nationality, unit, staff category (data generally available in Sysper)</li> <li>• Information provided by the reviewees on their own perception of their competencies</li> <li>• Information provided by reviewers on their perception of the reviewees' competencies</li> <li>• Feedback reports regarding the reviewees mentioning strengths and areas for development</li> </ul>
9.	Time limit for keeping the data	<p>After the debriefing with the reviewee, the sub-processor will store securely the files on their server and keep the data for 8 months. This would allow managers to compare his/her data in future if they wish to retake the exercise. However, if any manager specifically requests that his/her data be deleted after the debriefing interview takes place the processor will supply confirmation (screen shot) that this has been done. The owner of the individual report is the concerned reviewee (manager).</p> <p>The group reports, containing aggregated information without any possibility to track or identify individual answers, will be kept by the HRBA unit for a period of five years from the receipt of the report. The reason is to allow an analysis of the evolution in case HRBA decides to repeat the exercise.</p>
10.	Recipients of the data	The access to all personal data as well as all information collected in the context of the survey is only granted through Userid/Password to a defined population of users. They are:



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		<p>1) The person specifically designated within the HRBA unit to organise the 360 degree feedback exercise who is bound by the statutory obligation of confidentiality (Feedback Coordinator).</p> <p>2) An external consultant (Evaluator) in charge of analysing the data and preparing the analytical report for the manager concerned and who will receive only the raw data stemming from the 360 degree feedback exercise with no reference to the identity of the respondents (except for their staff category).</p> <p>These users will not have access to information provided by reviewers and reviewees such as ratings and other feedback collected in the context of the survey. For clarity they will only have access to the original personal data provided by EDPS to the processor.</p> <p>Recipients of the data: the processor and sub-processors who receives and processes the data; reviewee who receives his or her individual report on the feedback in an anonymous, aggregated form; a certified debriefer/coach from the contractor will also receive this report as support for the debriefing session. No individual data or report is received by the HRBA unit or by the senior management of the EDPS or by any other staff member of the EU institutions, agencies or offices. An aggregated group report will nevertheless be received by the senior management. This aggregated report will containing for example comments that there is a general tendency visible in the replies which concerns management as a whole and could thus be addressed by the organisation/senior management.</p> <p>No personal data are transmitted to parties which are outside the recipients and the legal framework mentioned.</p>
11.	Are there any transfers of personal data to third countries or international	Personal data are being transferred outside of EU and EEA.



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	<p>organisations? If so, to which ones and with which safeguards?</p>	<p>The supplier of the Impact 360 tool (Performance Consultants International) is based in the United Kingdom (UK) and hence, personal data is transferred to the UK.</p> <p>Transfers are based on Article 47 of the Regulation (EU) 2018/1725 - Transfers on the basis of an adequacy decision. Specifically, transfers are based on the <a href="#">Commission Implementing Decision of 28.6.2021 pursuant to Regulation (EU) 2016/679 of the European Parliament and of the Council on the adequate protection of personal data by the United Kingdom.</a></p> <p>Transfers to international organisations are not taking place.</p>
12.	<p>General description of security measures, where possible.</p>	<p>After the debriefing with the reviewee, the sub-processor will save the files on their server. This would allow for a manager to compare his/her data in future if he/she wishes to retake the exercise. However, if any manager specifically requests that his/her data be deleted after the debriefing interview takes place, sub-processor will supply confirmation (screen shot) that this has been done.</p> <p>All data are processed by the processor and sub-processor. Neither HRBA nor any staff within the institution of the reviewees will have access to the data. The processor will take care that every staff member and alternates having access to data has a recognised need to know.</p> <p>The processor declares that it has taken appropriate technical and organisational measures according to Article 32 GDPR to keep personal data secure and protected against unauthorised or unlawful processing and accidental loss, destruction or damage.</p> <p>In particular, the processor takes and regularly checks the following technical and organisational measures:</p> <p>Confidentiality</p> <p>Physical entry controls</p>



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		<p>No unauthorised access to the processor's office or data processing facilities. Access is granted through various controls. Office is protected by keys, electronic door openers, facility security services and/or entrance security staff, alarm systems, video/CCTV Systems.</p> <p>No unattended access for customers to our office is made possible. Data processing facilities are used through subcontractor and subject to a different agreement in accordance with article 27 GDPR.</p> <p>Removal controls</p> <p>Everyone uses equipment that is secured by keylock/security mechanisms (e.g. locks for laptops, encrypted devices etc.)</p> <p>Access controls</p> <p>No unauthorised use of the Data Processing and Data Storage Systems (electronic access control implemented: e.g.: (secure) passwords, automatic blocking/locking mechanisms, two-factor authentication, encryption of data carriers/storage media)</p>
13.	For more information, including how to exercise your rights to access, rectification, object and data portability (where applicable), see the data protection notice:	Available on the EDPS intranet.

