



EUROPEAN COMMISSION

European Health and Digital Executive Agency (HaDEA)

Data Protection Notice for 360° feedback on leadership competencies for managers

This Data Protection Notice describes the measures taken to protect your personal data with regard to the action involving the present data processing operation and what rights you have as a data subject.

European Health and Digital Executive Agency (HaDEA or Agency) protects the fundamental rights and freedoms of natural persons and in particular your right to privacy and the protection of your personal data.

Your personal data are processed in accordance with Regulation (EU) No 2018/1725¹ on the protection of individuals with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data.

Who is the data controller?

The data controller of the processing operation is the Head of Unit Staff, Communication and Support of the HaDEA.

The following **entities (contractors) processes** your personal data on our behalf:

- The GreenHouse Group, Rue de la Montagne 54/56 (B3), 1000 Bruxelles (Belgium); and
- TRANSFORMATION GmbH PERFORMANCE CONSULTANTS, Zehdenicker strabe 1, 10119 Berlin, Germany.

Which is the legal basis for processing your personal data?

The legal basis for the processing activities are the following articles: Article 5(1)(b) of Regulation (EU) 2018/1725 because processing is necessary for compliance with a legal obligation to which the controller is subject and in particular:

- Articles 24a and 110(2) of the Staff regulations² and
- Articles 11 and 81 of the CEOS; Decision SC01(2021)06 of the Steering Committee of the European Health and Digital Executive Agency of 26/02/2021 on the application by analogy of Commission Decision C(2016)3828 of 24/06/2016 on the implementation of the Learning and Development Strategy.

What is the purpose(s) of this processing activity?

The purpose(s) of this processing is to allow participants (reviewees) in the development programme for HaDEA managers to obtain feedback on their competencies related to HaDEA's leadership competency model. Other Commission Services routinely use this type of tool in 360° feedback as well as courses on management and leadership. The data will not be used in any form in the evaluation (appraisal) process of any of the persons involved.

Which personal data are collected?

The following of your personal data are collected:

- Data of a personal nature allowing the identification of the data subject (name, first name,

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 L295/39 of 21.11.2018).

² Regulation No 31 (EEC), 11 (EAEC), laying down the Staff Regulations of Officials and the Conditions of Employment of Other Servants of the European Economic Community and the European Atomic Energy Community as last amended by Commission Decision 2020/C 428/10.

electronic address, gender, position, administrative entity);

- Information provided by the reviewees on their own perception of their competencies related to the Agency's leadership competency model;
- Information provided by reviewers on their perception of the reviewees' competencies related to the HaDEA leadership competency model;
- Recommendations on training and on-the-job development activities matching development needs of reviewees.

HaDEA staff providing feedback (reviewers) will not be identified by name in the feedback report given to the reviewee, or in the feedback report received by the coach (for the feedback session with the reviewee).

The data are **mandatory** for the purpose(s) outline above.

Who has access to the personal data of data subjects and to whom can they be disclosed?

The recipients of your personal data will be:

- The contractor receives and processes the personal data of all parties (reviewees and reviewers).
- The programme participant him/herself receives the anonymous, amalgamated report of the feedback. In these individual reports the included free text comments provided by the reviewers could contain identifiable personal data linked to the potentiality of recognizing someone's own written style.
- A certified coach from the contractor will receive the same individual report as a support for the feedback session.
- No personal data is received by the HaDEA HR sector or senior management, or any staff member of the EU institutions, agencies or offices.
- Bodies charged with monitoring or inspection tasks in application of EU law (e.g. internal audits, Court of Auditors, European Anti-fraud Office (OLAF), EPPO).

Your personal data and the individual 360° Leadership Feedback Report will be **stored** on the server of the contractors in the EU. The following **technical and organisational security measures** are in place to safeguard the processing of personal data: The feedback by reviewers is done online and access is given only to people who obtained a code to enter their comments/evaluation. The reviewee has access to her/his individual 360° Leadership Feedback report through an individual access code provided by the external supplier.

The processing of your data will **not include automated decision-making** (such as profiling).

How long do we keep your personal data?

Your personal data will be kept for a maximum period of 12 months. The owner of the individual report is the concerned participant (reviewee) and the HaDEA HR sector will not receive a copy of it. Once the participant has obtained the individual 360° report, the contractor will automatically delete the report after 12 months. If a group report is produced, a copy is kept by the Agency's HR sector; it does not contain any personal data.

What are your rights regarding your personal data?

You have the right to access your personal data and to request your personal data to be rectified, if the data is inaccurate or incomplete; where applicable, you have the right to request a restriction of or to object to processing, to request a copy or erasure of your personal data held by the data controller. If processing is based on your consent, you have the right to withdraw your consent at any time, without affecting the lawfulness of the processing based on your consent before its withdrawal.

The reviewee has access to her/his own individual 360° Leadership Feedback report through an individual access code provided by the contractor. The reviewee and the reviewers are informed about the procedure and questionnaire they will receive and how to answer the questionnaire with the possibility to rectify data before sending it out. Access to the results will be restricted to the reviewee, who can ask the report to be erased from the server once it has been received.

Your request to exercise one of the above rights will be dealt with without undue delay and within **one month**.

If you have **any queries** concerning the processing of your personal data, you may address them to the Head of Unit Staff, Communication and Support (entity acting as data controller) via hadea-performance@ec.europa.eu or to HaDEA Data Protection Officer at HADEA-DPO@ec.europa.eu.

You shall have right of recourse to the European Data Protection Supervisor at <https://edps.europa.eu>.

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