

PRIVACY STATEMENT

This privacy statement addresses the processing of personal data in relation to the 360° Leadership Assessments used in the frame of the leadership competency framework developed at the EEA.

Personal data provided by EEA staff members are processed in accordance with Regulation (EC) No 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.

Processing operations are under the responsibility of the training and career development coordinator within the Human Resource Management Group (ADS1), acting as Data Controller, regarding the collection and processing of personal data.

1. Purpose of the processing

Within the leadership competency framework currently being revised, and under the ongoing leadership development programme, the EEA wishes to provide an additional, tailored tool to assess leaders' performance. This is an online tool designed specifically for leadership assessment and is provided by an external service provider, Kenexa, an IBM company. The 360° assessment tool runs an online survey based on the previously defined leadership competencies. For a given leader, the tool seeks the opinions of (1) his/her subordinates, (2) his/her peers and (3) his/her own manager. Based on the answers to that survey, the tool generates an automated report to be sent directly to the manager being evaluated. That report will support career development dialogues in informing decisions on further leadership development needs.

Your personal data is collected and further processed for the purpose of the management and administration of the 360° Leadership Assessments.

2. Modalities for the processing operation

The EEA learning and career development coordinator within the Human Resource Management Group will provide a list with your name, function and email address to the external service provider for enabling him to send you individual electronic invitation to access the online tool.

You will then enter your personal data directly in the online tool. Your individual responses to the questionnaires will then be processed on the basis of the methodology developed by the external service provider IBM/Kenexa who will send you (the assessed manager) an individual report with the outcomes of the assessments.

3. Legal basis and grounds for lawfulness of the processing

The Framework service contract No EEA/ADS/15/001 entered into between the EEA and the external service provider Kenexa, an IBM company, on 30.7.2015 describes the scope of the contract and the terms and conditions for its implementation.

The processing operation is considered lawful because:

- it is necessary for the performance and the support of a task carried out in the public interest by the Union institutions and bodies which includes the processing of personal data necessary for the management and functioning of those institutions and bodies (recital 27 and Article 5(a) of Regulation (EC) No 45/2001).
- When accessing the online tool, you unambiguously give your consent to the processing (Article 5(d) of Regulation (EC) No 45/2001).

4. Categories of data subject concerned

The personal data of the following data subjects are processed:

- Staff members currently employed at the EEA and holding a management function as Head of Programme
- Staff members currently employed at the EEA and holding an advisory function as Senior Adviser
- Staff members currently employed at the EEA and holding a management function as Head of Group

All staff members currently employed at the EEA are prompted / invited to respond to the 360° survey. For that purpose, the name, email address and indication of respective department of all staff is provided to the consultants. The information provided by staff is nevertheless kept anonymous in the reports generated.

5. Data retention

Your data collected through the 360° leadership assessment questionnaires are stored for a period of maximum of six months following the end of the annual survey.

6. Categories of personal data processed

The following personal data are collected and transferred to the external service provider responsible for running the leadership orientations questionnaires:

- your name, email address and hierarchical relationship with the assessed manager (subordinate, peer or line-manager).
- Information and data you enter in response to the questionnaires

You will receive an email from IBM/Kenexa inviting you to access the online tool and fill out the 360° assessment questionnaires. Upon completion, the assessed manager will receive an automated report based on aggregated data.

7. Recipients of the data processed

The following persons could have access to your data:

- A limited number of staff of IBM/Kenexa - the external service provider – for the purpose of setting-up the tool and verify the assessment report;

Note that the learning and career development coordinator in ADS1, i.e. the data controller, will only have access to aggregated and anonymous data specified in the organisational level report.

8. Right of access and rectification

If you wish to verify, modify or delete the personal data you provided, you can do it via your access to the online questionnaire.

Moreover, you have the right to ask the Data Controller to block the processing of your personal data if their accuracy is contested, for a period enabling the Data Controller to proceed to the verifications. The Data Controller should reply without delay.

Any request for blocking of personal data shall be addressed in writing at the following addresses: [Luis pinto@eea.europa.eu](mailto:Luis.pinto@eea.europa.eu) or European Environment Agency, Mr Luis Pinto, Training and career development coordinator, Kongens Nytorv 6, 1050 Copenhagen K, Denmark. Any request for blocking or erasure of your data will be completed usually immediately, but at maximum within two working days.

9. Right to appeal

You are entitled to have recourse at any time to the European Data Protection Supervisor (<https://edps.europa.eu>; EDPS@edps.europa.eu) if you consider that your rights under Regulation (EC) No 45/2001 have been infringed as a result of the processing of your personal data by the EEA.

You may also contact the EEA's Data Protection Officer (DPO) in case of any difficulties or for any questions relating to the processing of your personal data at the following e-mail address: Data.ProtectionOfficer@eea.europa.eu.