

## PRIVACY STATEMENT

### 360° Feedback Exercise for Managers at EDA

#### 1. INTRODUCTION

This Privacy Statement describes the measures taken to protect your personal data with regard to the actions involving the present data processing operation and what rights you have as a data subject.

The European Defence Agency (EDA) protects the fundamental rights and freedoms of natural persons and in particular their right to privacy with respect to the processing of personal data (Article 1.1 of Regulation No 2018/1725).

#### 2. CONTROLLER OF THE PROCESSING OPERATION

Human Resources Unit  
European Defence Agency  
Rue des Drapiers 17-23  
B-1050 Brussels  
<https://eda.europa.eu/>  
[learninganddevelopment@eda.europa.eu](mailto:learninganddevelopment@eda.europa.eu)

#### 3. PROCESSOR

Deloitte Consulting & Advisory BV (hereafter referred to as "Deloitte");  
[spatteet@deloitte.com](mailto:spatteet@deloitte.com) .

The processor uses a sub-processor, Medallia (<https://www.medallia.com>), a survey platform provider, for the data hosting and launch for the feedback surveys.

The processor and sub-processor are located in Europe.

#### 4. PURPOSE OF THE PROCESSING

The 360° feedback exercise is a professional developmental tool for EDA managers.

The purpose of the processing is to allow managers (reviewees) participating in the exercise to obtain feedback on their management and leadership skills from a number of respondents (assessors) through an online survey with a view to increase evaluated managers' awareness of their strengths and of areas that could be further developed.

The results are compiled in:

- an aggregated organisational report with anonymous results to the Human Resources Unit of questionnaire answers; open comments are reproduced ad verbatim
- an individual report to each reviewee which is the basis for a series of confidential discussions between the participating manager (reviewee) and a human resources expert from Deloitte as a starting point for further professional development. It is at the reviewee's discretion to disclose the outcomes with their line manager or other stakeholders.

The data will not be used in any form of evaluation (appraisal) process of any of the persons involved.

The legal bases of the procedure are EDA Staff Regulations (Article 30(1)), EDA learning and development framework and EDA Internal Control Standards.

## **5. DATA PROCESSED**

Data processed are the following:

Data relating to the participating manager: name, email address, directorate/unit, managers' job descriptions.

Data relating to the respondents: name, email address, category of respondents (manager of reviewee, peer, team member, internal stakeholder)

## **6. RECIPIENTS OF THE DATA**

The Controller (HR Unit - staff in charge of L&D activities) will have access to the data referred to under point 4.

In addition to the data above, the processor Deloitte and the sub-processor Medallia will also have access to respondents' replies to the questions as set out in the questionnaire sent to reviewees and assessors.

Lastly, data subjects (reviewees) will have access to their own individual report with the anonymous aggregated results per competency cluster, per competency and per respondent group, including a graph with the overall score per competency; all answers to the open questions, reproduced ad verbatim; an overview of three competencies which would most benefit from further development. Recipients of this feedback have the unique possibility to receive honest feedback, in a confidential way and feedback is given by a Deloitte consultant / coach in a constructive, developmentally focused and future oriented way. Based on the findings of the 360° and on the development priorities, the participant and his / her coach engage in setting up a personal development plan.

NB: The full report and detailed findings are discussed between the external consultant and the reviewee during the debriefing session and the coaching session. The report is not shared with the manager of the reviewee (participating manager). The report belongs exclusively to the participant and only the participant can decide to share it with others.

## **7. PROTECTION AND SAFEGUARDING OF THE DATA**

Having regards to the state of the art and the cost of their implementation the controller has implemented appropriate technical and organisational measures to ensure a level of security appropriate to the risks represented by the processing and the nature of the personal data to be protected (restricted access, logs, etc.). Such measures have been taken in particular to prevent any unauthorised disclosure or access, accidental or unlawful destruction or accidental loss, or alteration and to prevent all others unlawful forms of processing. The processor has a national and global Information security control framework, which serves as the standard for data protection. The processor team handling the data on behalf of EDA commits to respect the principles laid out in that internal data protection policy. Deloitte Belgium's Security & Privacy office is responsible for bringing about the necessary mechanisms for compliance with relevant Data Protection rules.

All documents are transferred via a secure solution that allows for sending and receiving documents in a protected environment. Medallia, the sub-processor, hosts the online survey platform in multiple data centres in different EU locations. All data is stored in highly secure Class A data centres located within the EU that undergo regular security audits. Data is encrypted at multiple levels (i.e. at storage (3 layered encryption), field-level; on the wire, and for file transfer). In addition, all data is synchronized in real time between data centres, with multiple copies on multiple servers and hard drives, making data loss impossible. European Deloitte Member Firms keep their Medallia data within Europe

where no account data is ever transferred between regions. The Medallia platform is secured with 128-bit SSL certificates that guarantee a very high level of encryption and security. The use of SSL ensures that all data exchanged between browser and server is encrypted. Deloitte has audited Medallia and found that it to be the best system assessed so far in terms of privacy, confidentiality, and security.

#### **8. RIGHT OF ACCESS AND RECTIFICATION OF THE DATA**

Data subjects have the right to access their personal data and the right to correct any inaccurate or incomplete personal data, as well as to request the removal of their personal data, which will be implemented within 15 working days after the request has been deemed legitimate. If the data subject has any queries concerning the processing of his/her personal data, s/he may address them to the data controller at the following mailbox: [learninganddevelopment@eda.europa.eu](mailto:learninganddevelopment@eda.europa.eu).

Justified requests for blocking and erasure are treated within 15 working days after the request has been deemed legitimate.

#### **9. TIME LIMIT FOR STORING DATA**

Personal data collected for this processing operation is retained only as long as necessary for the organisation of the exercise (name, category of respondent (peer, etc.) and e-mail address) and as long as participants pursue follow-up actions in relation to the 360° Feedback Programme or until the next time the manager participates in the 360° Feedback Programme within a maximum of three years.

The processor and sub-processor will delete the data they hold for the purposes of this processing operation at the controller's request to delete the data to the processor, once the exercise is concluded. Otherwise, the retention period by the processor and sub-processor will be 10 years.

EDA, as controller, may retain anonymous data for statistical purposes. EDA pays particular attention to preserve anonymity of personal data for these purposes, especially to all the measures necessary to avoid indirect identification.

#### **10. LEGAL BASIS FOR THE PROCESSING OPERATION**

Article 5(b) of Regulation 2018/1725.

Article 31 of Council Decision (CFSP) 2015/1835 of 12 October 2015 defining the statute, seat and operational rules of the European Defence Agency.

#### **11. CONTACT DPO**

In case you have any questions or queries concerning data protection at the European Defence Agency, you can also contact the Data Protection Officer at [dataprotection@eda.europa.eu](mailto:dataprotection@eda.europa.eu).

#### **12. RECOURSE TO EDPS**

As a data subject you have the right to have recourse at any time to the European Data Protection Supervisor (<http://www.edps.europa.eu>) at [edps@edps.europa.eu](mailto:edps@edps.europa.eu).

#### **13. ADDITIONAL INFORMATION**

More information on Data Protection at the European Defence Agency can be obtained on our public website <https://www.eda.europa.eu/Aboutus/how-we-work/data-protection>.