

## 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 action involving the present data processing operation and what rights you have as a data subject.

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

EUROPEAN DEFENCE AGENCY  
Rue des Drapiers 17-23  
B-1050 Brussels  
[www.eda.europa.eu](http://www.eda.europa.eu)

**Processor:** Hudson Belgium Nv.

#### 3. PURPOSE OF THE PROCESSING

The 360° feedback exercise is a professional developmental tool.

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

The results are compiled in one single report which is the basis for a series of confidential discussions between the participating manager, his/her manager and a human resources expert from Hudson and acts as a starting point for further professional development.

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.

#### 4. DATA PROCESSED

Data processed are the following:

- Identification and contact details: name and email address
- Personal characteristics: gender (for participating managers only) Professional data: category of respondent (participating managers, managers, peers, team members, internal stakeholders)

## **5. 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, the processor (Hudson Belgium Nv) will also have access to replies to the questions as set out in the questionnaire sent to participants and respondents. Lastly, data subject (Participating manager) will have access to the full 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 verbatim; an overview of three competencies which would most benefit from further development.

NB: The full report and detailed findings are discussed between the external consultant and the participant alone during the debriefing session. The report is not shared with the manager of the participating manager. The report belongs exclusively to the participant and only the participant can decide to share it with others. The participant's manager will be involved in the initial part of the 2-hour Personal Development Plan session in order to involve the manager as a support in the further development process (to provide feedback on behaviours, to discuss development actions, to offer development opportunities, etc.) and to embed learning in the work place.

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

Having regards to the state of the art and the cost of their implementation the controller have 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

## **7. 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: [hadmin@eda.europa.eu](mailto:hadmin@eda.europa.eu)

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

## **8. 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, gender (for participants managers only), 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 with a maximum of three years.

The processor will delete the data it holds for the purposes of this processing operation as soon as the exercise is terminated (end of contract with controller).

EDA 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.

## **9. 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.

**10. 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).

**11. 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).

**12. 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>.