

**REGISTER NUMBER: 492**

**NOTIFICATION FOR PRIOR CHECKING**

Date of submission: 30/03/2009

Case number: 2009-215

Institution: EIB

Legal basis: article 27-5 of the regulation CE 45/2001<sup>(1)</sup>

*(1) OJ L 8, 12.01.2001*

**INFORMATION TO BE GIVEN<sup>(2)</sup>**

*(2) Please attach all necessary backup documents*

1/ Name and address of the controller  
European Investment Bank  
100, Blv Konrad Adenauer  
L-2950 Luxembourg

2/ Organisational parts of the institution or body entrusted with the processing of personal data  
HR/ Head of division People and Organisational Development

3/ Name of the processing  
Procedures related to 360° Leadership Feedback Report within EIB

4/ Purpose or purposes of the processing  
After formalisation of the objectives for the year as part of the e-appraisal exercise, to obtain feedback from peers, manager and direct reports regarding behaviours at work in order to formalise the needs of training and the programs for professional development. Identification of employees' strengths and areas for development based on competency models for EIB. The purpose of this feedback is to provide a voluntary input to the data subject in terms of competencies' awareness that will ease the development process.

5/ Description of the category or categories of data subjects  
Managers and experts at C-level and above within EIB.

6/ Description of the data or categories of data (*including, if applicable, special categories of data (article 10) and/or origin of data*).

Categories of data:  
360° Leadership Feedback reports that include manager, peers and direct reports appraisal of competencies.  
Example attached.

Type of data:  
Name, First Name, position, direction or division  
Strengths and Areas for development (in relation to the leadership competency model )  
Recommendation on Training and on-the-job development activities matching development needs.

7/ Information to be given to data subjects  
A Development guide, information regarding access to the 360° questionnaires, confidentiality of the data, 360° process and participants, type of reports they will get, competency models and use and storage of the data. Example attached.  
It is scheduled to organise a presentation about 360°, the Development Guide and Plans, starting with a pilot population. HR newsletter and intranet will also inform adequately about the 360° Leadership feedback launch.

8/ Procedures to grant rights of data subjects (*rights of access, to rectify, to block, to erase, to object*)  
The data subject will have access to her/his individual 360° Leadership Feedback report through an individual access code provided by the external supplier. The participants are previously informed about the procedure and questionnaire they will receive and how to answer the questionnaire with possibility to rectify before sending it out. Access to the results is to be restricted to the data subject, who can erase the report from the server once it has been received. Hierarchy and authorized HR people within People Organisation & Staff management will receive Group reports containing statistical data of results but anonymous without reference to the names. Both the data subject and those participating as reviewers will be clearly informed about this procedure.

9/ Automated / Manual processing operation  
360° Leadership Feedback will be devoted only to managers and experts at C-level and above. This feedback data will be strictly confidential with access only to the reviewee. Once the invited participants have answered, the results will be consolidated and an automatic report will be received by the data subject who will be the owner of the report. The data subject could comment or share the results obtained with her/his manager for discussion during the development meeting to conclude on an individual development plan. There is no manual processing of data.

10/ Storage media of data  
360° Leadership Feedback Report will be stored on the external provider server (Cubiks). Doc attached.

11/ Legal basis and lawfulness of the processing operation  
Staff Regulations and Staff Rules. Benchmark roles and job families of which the description of the competencies are an important part of, were introduced in the Bank in 2007 to provide a platform to integrate HR activities including recruitment and training and development.  
In January 2009, EIB Board of Directors approved the Corporate Operation Plan for 2009 to 2011 (CA doc423/09) that includes the new HR strategy. Point 5- Staff matters states that the significant changes in both operational and human resources, lead the Bank to reformulate the Human Resources 2007 previous Strategy (CA doc.07/283) and redefine the priorities. Motivation and individual development is the second pillar. It describes that HR will focus its efforts regarding training and individual development plans. The President and the Management Committee have approved a project called Building our Future within one of the Directorates, OpsA, as a pilot for the rest of the Bank where 360° Leadership Feedback is one of the expected deliveries.

12/ The recipients or categories of recipient to whom the data might be disclosed

The report containing the 360° Leadership feedback will be accessible only to the data subject. HR responsible persons (Learning and Development and People and Organisation division nominated persons) will have access only to aggregated information about the best and worse rated competencies but without name associated. An example of a Group report is attached. The respondents to the questionnaire will have a timeframe of 2 weeks to answer a 15 minutes questionnaire. Once the questionnaire has been completed and submitted, the access will be closed. They will not have access to the consolidated results. They will be previously informed about the procedure.

13/ retention policy of (categories of) personal data

360° leadership feedback report, will be stored in an external provider server. The owner is the person (manager, expert) and HR will not store a copy of it. HR will receive from the provider as follow up, statistical data on the results but with no name identification. This aggregated data will be accessible to the authorized HR people (Director, People & Organisation Head of Division, Learning and Development responsible) and General Directors. Once the data subject has obtained the 360° report, she/he can delete it at any time. The 360° report will be deleted automatically by the external provider Cubiks after 2 years.

13 a/ time limits for blocking and erasure of the different categories of data

(on justified legitimate request from the data subject)

*(Please, specify the time limits for every category, if applicable)*

360° reports will be only accessible to the data subject through an access code. The data subject can delete her/his report at any time in the server of the external provider. In any case and after 2 years, the 360° report will be automatically deleted in the provider server.

14/ Historical, statistical or scientific purposes

*If you store data for longer periods than mentioned above, please specify, if applicable, why the data must be kept under a form which permits identification,*

non applicable

15/ Proposed transfers of data to third countries or international organisations

360° Leadership Feedback data will be stored by external provider Cubiks with UK server.

No transfer to third countries or international organisations will take place.

16/ The processing operation presents specific risk which justifies prior checking (*please describe*):

Article 27.2.(b)

Processing operations intended to evaluate personal aspects relating to the data subject, as competency, performance or behaviours.

17/ Comments

PLACE AND DATE: Luxembourg, 27 March 2009

DATA PROTECTION OFFICER: Jean-Philippe Minnaert

INSTITUTION OR BODY: European Investment Bank