

**REGISTER NUMBER: 559**

**NOTIFICATION FOR PRIOR CHECKING**

Date of submission: 4/1/2010

Case number: 2010/002

Institution: Commission

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 adress of the controller

2) Name and First Name of the Controller:STROOSNIJDER Marinus

3) Title:Head of Unit

4) Directorate, Unit or Service to which the Controller is attached:C.6

5) Directorate General to which the Controller is attached:JRC

2/ Organisational parts of the institution or body entrusted with the processing of personal data

26) External Company or Directorate General to which the Processor is attached:

25) External Company or Directorate, Unit or Service to which the Processor is attached:

Greenhous Group bvba

3/ Name of the processing

LEADERSHIP EFFECTIVENESS.

4/ Purpose or purposes of the processing

To allow participants in Ispra Site Directorate training courses to obtain anonymous feedback on their management and leadership style from their colleagues with the aim helping them improve their management and leadership skills. This type of tool is commonly used internationally by training providers in courses on management and leadership. The data will not be used in any form of evaluation ( appraisal) process of any person involved.

5/ Description of the category or categories of data subjects

14) Data Subject(s) concerned:

Officials and other Commission Staff participating in courses organised by the Ispra Site Directorate.

16) Category(ies) of Data Subjects:

Officials and other Commission Staff participating in courses organised by the Ispra Site Directorate.

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

17) Data field(s) of Data Subjects:

Attention: Please indicate and describe in the answer to this question also data fields which fall under article 10

? Name, first name, electronic address, internal postal adress.

? Information provided by the participant on their own perception of their management and leadership skills in areas such as performance management, change management, issue management and people management.

? Information provided by assessors on their perception of the participant's management and leadership skills in areas such as performance management, change management, issue management and people management. This information is rendered anonymous and amalgamated into a feedback report, except for the information provided by the senior, considering the fact that normally each participant has only one senior manager where he refers to.

Please see documents under point 38.

18) Category(ies) of data fields of Data Subjects:

Attention: Please indicate and describe in the answer to this question also categories of data fields which fall under article 10

? Name, first name, electronic address, internal postal adress.

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? Information provided by assessors on their perception of the participant's management and leadership skills in areas such as performance management, change management, issue management and people management. This information is rendered anonymous and amalgamated into a feedback report, except for the information provided by the senior, considering the fact that normally each participant has only one senior manager where he refers to.

Please see documents under point 38.

7/ Information to be given to data subjects

15a) Which kind of communication(s) have you foreseen to inform the Data Subjects as described in articles 11 - 12 under 'Information to be given to the Data Subject'

All persons participating in this activity will receive an information note to explain the processing and the treatment of data.

Please see privacy statement.

8/ Procedures to grant rights of data subjects (rights of access, to rectify, to block, to erase, to object)(rights of access, to rectify, to block, to erase, to object)

15b) Which procedure(s) did you put in place to enable Data Subjects to exert their rights: access, verify, correct, etc., their Personal Data as described in articles 13 - 19 under 'Rights of the Data Subject' :

The data subject can use the functional mailbox :  
JRC-ISD-Suggestions-and-Complaints@ec.europa.eu  
to exert his/her rights. See also privacy statement.

9/ Automated / Manual processing operation

7) Description of Processing:

Attention: Please describe in the answer to this question if you process personal data falling under article 27 "Prior-Checking (by the EDPS - European Data Protection Supervisor)"

The leadership effectiveness participants have the opportunity to use a 360° feedback tool in the form of a self assessment and an assessment by seniors and colleagues (direct reports, peers) that they choose to be consulted. Participation, in this activity by the person concerned is voluntary. The persons invited to assess the participants, called hereby assessors, may choose whether or not to take part.

The tool aims to help participants learn about their professional skills and enhance their own personal development in an professional context.

This processing of personal data is subject to art.27.

8) Automated Processing operation(s):

The data is entered into a website to which the person concerned and their colleagues have separated and individual access.

9) Manual Processing operation(s):

No manual processing is foreseen.

10/ Storage media of data

Electronic and paper media.

11/ Legal basis and lawfulness of the processing operation

11) Legal basis of Processing:

- Commission Decision of 7 May 2002 on staff training. In particular, Article 2 refers to the objectives of training activities: Staff training in the Commission shall have as fundamental objective to expand and improve individuals' competencies so that each staff member can contribute optimally to achievement of the Institution's goals. At the individual level, training should serve to improve professional effectiveness and should contribute to every staff member's sense of fulfilment, belonging and commitment at the workplace. By developing relevant knowledge, skills and attitudes, training should further help individuals to make desired career moves, both laterally (mobility) and vertically (promotion, including change of category).
- Detailed rules for the application of the general staff provisions for giving effect to the third paragraph of Article 24 of the regulations as regards training of Commission staff of 18 March 1994.

12) Lawfulness of Processing:

Answering this question please also verify and indicate if your processing has to comply with articles 20 "Exemptions and restrictions" and 27 "Prior checking (by the EDPS)"

The processing is lawful according Art. 5(a) of Regulation (EC) 45/2001.

The data subject concerned has unambiguously given his/her consent according to Art. 5.d

This processing of personal data is subject to art.27.

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

20) Recipient(s) of the Processing:

The ISD contractor, named herby contractor, makes the relation between the anonymous data and the participants. The subcontractor will process only anonymous data.

The participant receives an anonymous, amalgamated report of the feedback; on which of the participant, the report can be shared with the course facilitator. The data will not be available to any other staff member of the European Institutions than the participant.

21) Category(ies) of recipients:

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The participant receives an anonymous, amalgamated report of the feedback; on which of the participant, the report can be shared with the course facilitator. The data will not be available to any other staff member of the European Institutions than the participant.

13/ retention policy of (categories of) personal data

Data (electronic and paper media) will be deleted 3 month after the report has been sent to the data subject.

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)  
(on justified legitimate request from the data subject)  
(Please, specify the time limits for every category, if applicable)

22 b) Time limit to block/erase data on justified legitimate request from the data subjects

Upon a justified request by the data subject the personal data will be modified/blocked within 14 days.

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,*

22 c) 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

Not applicable.

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

27) Legal foundation of transfer:

Only transfers to third party countries not subject to Directive 95/46/EC (Article 9) should be considered for this question. Please treat transfers to other community institutions and bodies and to member states under question 20.

Not applicable.

28) Category(ies) of Personal Data or Personal Data to be transferred:

Not applicable.

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

7) Description of Processing:

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This processing of personal data is subject to art.27.

Article 27.2.(a) Processing of data relating to health and to suspected offences, offences, criminal convictions or security measures,

n/a

Article 27.2.(b) Processing operations intended to evaluate personal aspects relating to the data subject,

Article 27.2.(b) Processing operations intended to evaluate personal aspects relating to the data subject,

Article 27.2.(c) Processing operations allowing linkages not provided for pursuant to national or Community legislation between data processed for different purposes,

n/a

Article 27.2.(d) Processing operations for the purpose of excluding individuals from a right, benefit or contract,

n/a

Other (general concept in Article 27.1)

n/a

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17/ Comments

1) Date of submission:

10) Comments if applicable:

Participation in this activity by the person concerned and their colleagues is entirely voluntary and participants are free to choose the persons whom they wish to invite to take part in this activity. The persons so invited may choose whether or not to take part.

The similar notification DPO 2706 is covering only the EAS (EPSO). This notification has a different controller and covers only the JRC Ispra Site Directorate.

36) Do you publish / distribute / give access to one or more printed and/or electronic directories?

Personal Data contained in printed and/or electronic directories of users and access to such directories shall be limited to what is strictly necessary for the specific purposes of the directory.

If Yes, please explain what is applicable.

no

37) Complementary information to the different questions if applicable, including attachments to this notification which should not be public :

The enclosed sample feedback reports includes the 35 questions to be answered by the participants and assessors on leadership behaviours.

PLACE AND DATE:23/12/2009

DATA PROTECTION OFFICER: RENAUDIÈRE Philippe

INSTITUTION OR BODY:European Commission