

*(To be filled out in the EDPS' office)*

**NOTIFICATION FOR PRIOR CHECKING**

**DATE OF SUBMISSION: 15/06/2017**

**CASE NUMBER: 2017-0580**

**INSTITUTION: EIB**

**LEGAL BASIS: ARTICLE 27-5 OF THE REGULATION CE N° 45/2001<sup>(1)</sup>**

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

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

Personnel Directorate / Head of Division Development and Performance

3/ NAME OF THE PROCESSING

Procedures related to 360° (multirater) Leadership Feedback Report within EIB

4/ PURPOSE OR PURPOSES OF THE PROCESSING

To obtain feedback from peers, manager and direct reports regarding behaviours at work in order to provide a basis for personalised training and professional development. The feedback has no relation at all with the data subject's performance assessment and related rewards. The sole purpose of the feedback is to provide a voluntary input to the data subject in terms of learning needs awareness, to increase the personal relevance, ownership and effectiveness of the envisaged training

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<sup>1</sup> OJ L 8, 12.01.2001.

<sup>2</sup> **Please attach all necessary backup documents**

## 5/ DESCRIPTION OF THE CATEGORY OR CATEGORIES OF DATA SUBJECTS

Advisors to the EIB Management Committee (MC)

## 6/ DESCRIPTION OF THE DATA OR CATEGORIES OF DATA (*including, if applicable, special categories of data (Article 10) and/or origin of data*).

360° Leadership feedback reports that include manager, peers and if relevant direct reports feedback on perceived leadership behaviours and competencies

Type of data:

Name, first name

Self and others' perception of competency levels in the different dimensions of the leadership model

Confidential feedback on the three categories:

- Behaviours to keep doing
- Behaviours to start doing
- Behaviours to stop doing

## 7/ INFORMATION TO BE GIVEN TO DATA SUBJECTS

Information regarding access to the 360° questionnaires; the underlying leadership model; voluntary nature of the exercise, confidentiality and storage of the data, 360° process and participants, and type of report and feedback they will get; a detailed feedback report and development guide

## 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

The feedback data will be strictly confidential with access only to the reviewee and the external coach. Once the invited participants have answered, the results will be consolidated and an automatic report will be generated that is delivered to the data subjects by the external coach, together with the necessary explanations and advice for using the report for a personalised learning plan. There is no manual processing of data.

## 10/ STORAGE MEDIA OF DATA

The multi-rater feedback report will be stored on the external provider server (Leadership Circle). The document certifying Leadership Circle under the EU Privacy Shield framework for compliance with EU data protection regulation is attached.

Leadership Circle does not treat any data in third countries, outside the US. Additionally, Leadership Circle has strict policies on data security. All employees and contractors must sign and abide by these policies.

11/ LEGAL BASIS AND LAWFULNESS OF THE PROCESSING OPERATION

The Data subject's consent in accordance with Articles 5(d) and 2(h) of Regulation (EC) No 45/2001. – in accordance with the opinion of the EDPS (case 2009-0215)

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. 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 any ~~the consolidated~~ results. They will be previously informed about the procedure.

13/ RETENTION POLICY OF (CATEGORIES OF) PERSONAL DATA

The 360° leadership feedback report will be stored in an external provider server. The owner is the person (manager, expert) and HR will not receive or store a copy of it.. 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 Leadership Circle after 6 months

13 A/ TIME LIMIT TO BLOCK/ERASE ON JUSTIFIED LEGITIMATE REQUEST FROM THE DATA SUBJECTS

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 6 months, the 360° report will be automatically deleted in the provider server

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

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 Leadership Circle with secure US server – certified by No transfer to third countries or international organisations will take place.

16/ THE PROCESSING OPERATION PRESENTS SPECIFIC RISK WHICH JUSTIFIES PRIOR CHECKING (*Please describe*):

AS FORESEEN IN:

↑ Article 27.2.(b)

*Processing operations intended to evaluate personal aspects relating to the data subject,*

17/ COMMENTS

PLACE AND DATE: 14/06/2017

DATA PROTECTION OFFICER: PELOPIDAS DONOS

INSITUATION OR BODY: EUROPEAN INVESTMENT BANK