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ASSISTANT SUPERVISOR

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C 2015-0440 & 2015-0441
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Subject: Notifications on "*Development program for COMP senior managers. Use of 108° tool of feedback on leadership competencies*" (2015-0440) and on "*360° feedback exercise for DG EAC managers*" (2015-0441).

Dear Mr Renaudière,

I refer to the two notifications you have sent to the EDPS regarding two new processing operations: "*Development program for COMP senior managers. Use of 108° tool of feedback on leadership competencies*" from DG COMP and "*360° feedback exercise for DG EAC managers*" from DG-EAC.

As you have mentioned in the cover notes attached to the notifications, these new processing operations are similar to four previously prior-checked notifications under Article 27(2)(b) of Regulation (EC) 45/2001 (the Regulation)¹. You have also pointed out that the EDPS recommendations of the four previous cases are fully implemented in the new processing operations in hand and that there is no reason to request a prior-checking analysis from the EDPS.

In this regard, we would highlight a similar more recent case² where the EDPS made recommendations to DG MARE; we encourage you to take them into consideration and implement them where necessary. Furthermore, the EDPS will keep both notifications in its own register for fairness and transparency in accordance with Article 27(5) of the Regulation.

¹ 2014-0446, 2013-1290, 2012-0590, 2009-0215.

² "*Middle Management Programme - 360° Feedback leadership Circle*", case 2014-0906. EDPS Opinion on 12 December 2014.

In light of the accountability principle, the EDPS trusts that the Commission has adopted adequate data protection safeguards in carrying out the new processing operations in conformity with the Regulation. We have therefore decided to close the case.

Should you have further doubts, please do not hesitate to contact us.

Kind regards,

(signed)

Wojciech RAFAŁ WIEWIÓROWSKI